

# EXHIBIT 11

# **Video Deposition of Susan Phillips**

January 23, 2024

Hendrix v. CRC Insurance Services, Inc., et  
al.

2:21-CV-0300-MHH



866.993.0207  
info@citedepos.com  
www.citedepos.com

<div>Page 1</div> <div> 1 IN THE UNITED STATES DISTRICT COURT  2 NORTHERN DISTRICT OF ALABAMA  3 SOUTHERN DIVISION  4  5 CASE NUMBER: 2:21-CV-0300-MHH  6  7 KATHRYN HENDRIX,  8 Plaintiff,  9 vs.  10 CRC INSURANCE SERVICES, INC., TRUIST FINANCIAL  11 CORP., and TRUIST BANK,  12 Defendants.  13  14  15 VIDEO DEPOSITION TESTIMONY OF:  16 SUSAN PHILLIPS  17  18  19 JANUARY 23, 2024  20 2:03 P.M.  21  22  23 </div>	<div>Page 3</div> <div> 1 of the trial, or at the time said deposition is  2 offered in evidence, or prior thereto.  3 IT IS FURTHER STIPULATED AND AGREED  4 that notice of filing of the deposition by the  5 Commissioner is waived.  6  7  8  9  10  11  12  13  14  15  16  17  18  19  20  21  22  23 </div>
<div>Page 2</div> <div> 1 S T I P U L A T I O N  2 IT IS STIPULATED AND AGREED by and  3 between the parties through their respective  4 counsel that the video deposition of SUSAN  5 PHILLIPS may be taken before Tanya D. Cornelius,  6 RPR, CSR, and Notary Public, at the offices of  7 Wilkinson Law Firm, P.C., 1717 3rd Avenue North,  8 Suite A, Birmingham, Alabama, on the 23rd day of  9 January, 2024, commencing at approximately 2:03  10 p.m.  11 IT IS FURTHER STIPULATED AND AGREED  12 that the signature to and the reading of the  13 deposition by the witness is NOT waived, the  14 deposition to have the same force and effect as  15 if full compliance had been had with all laws  16 and rules of Court relating to the taking of  17 depositions.  18 IT IS FURTHER STIPULATED AND AGREED  19 that it shall not be necessary for any  20 objections to be made by counsel to any  21 questions, except as to form or leading  22 questions, and that counsel for the parties may  23 make objections and assign grounds at the time </div>	<div>Page 4</div> <div> 1 I N D E X  2 EXAMINATION BY: PAGE NUMBER  3 MS. PALMER 8  4  5 * * * * *  6  7 EXHIBIT INDEX  8 PLAINTIFF'S EXHIBIT NO: PAGE NUMBER  9 39 Notice of Deposition 8  10 40 Text Messages 74  11  12  13  14  15  16  17  18  19  20  21  22  23 </div>

<p>Page 5</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 FOR THE PLAINTIFF:</p> <p>4 PALMER LAW, LLC</p> <p>5 BY: Leslie A. Palmer, Esq.</p> <p>6 104 23rd Street South, Suite 100</p> <p>7 Birmingham, Alabama 35233</p> <p>8</p> <p>9 WILKINSON LAW FIRM, P.C.</p> <p>10 BY: Cynthia Forman Wilkinson, Esq.</p> <p>11 1717 3rd Avenue North, Suite A</p> <p>12 Birmingham, Alabama 35203</p> <p>13</p> <p>14 FOR THE DEFENDANTS:</p> <p>15 BAKER, DONELSON, BEARMAN, CALDWELL</p> <p>16 &amp; BERKOWITZ, P.C.</p> <p>17 BY: Rachel Barlotta, Esq.</p> <p>18 420 North 20th Street, Suite 1400</p> <p>19 Birmingham, Alabama 35203</p> <p>20</p> <p>21 ALSO PRESENT: Kat Hendrix</p> <p>22 Taylor Holland,</p> <p>23 Videographer</p>	<p>Page 7</p> <p>1 District of Alabama, Southern Division, Case</p> <p>2 Number 2:21-CV-0300-MHH.</p> <p>3 Counsel, please identify yourselves</p> <p>4 for the record, and we'll start with the</p> <p>5 plaintiffs.</p> <p>6 MS. PALMER: Leslie Palmer for the</p> <p>7 plaintiff, Kathryn Hendrix.</p> <p>8 MS. WILKINSON: Cynthia Wilkinson for</p> <p>9 the plaintiff, Kathryn Hendrix.</p> <p>10 MS. BARLOTTA: Rachel Barlotta for</p> <p>11 defendants, CRC Insurance and Truist.</p> <p>12 VIDEOGRAPHER: Thank you.</p> <p>13 Will our court reporter please</p> <p>14 administer the oath to the witness.</p> <p>15</p> <p>16 SUSAN PHILLIPS,</p> <p>17 being first duly sworn, was</p> <p>18 examined and testified as follows:</p> <p>19</p> <p>20 THE REPORTER: Will this be usual</p> <p>21 stipulations?</p> <p>22 MS. BARLOTTA: We're going to read</p> <p>23 and sign. Thank you.</p>
<p>Page 6</p> <p>1 I, Tanya D. Cornelius, RPR, CSR, and</p> <p>2 Notary Public, acting as Commissioner, certify</p> <p>3 that on this date, as provided by the Federal</p> <p>4 Rules of Civil Procedure, and the foregoing</p> <p>5 stipulation of counsel, there came before me at</p> <p>6 the offices of Wilkinson Law Firm, P.C., 1717 3rd</p> <p>7 Avenue North, Suite A, Birmingham, Alabama,</p> <p>8 beginning at 2:03 p.m., SUSAN PHILLIPS, witness</p> <p>9 in the above cause, for oral examination,</p> <p>10 whereupon the following proceedings were had:</p> <p>11</p> <p>12</p> <p>13 VIDEOGRAPHER: We are going on the</p> <p>14 record. The date is January 23rd, 2024. The</p> <p>15 time on the monitor is 2:03 p.m. Central Time.</p> <p>16 My name is Taylor Holland, and our court reporter</p> <p>17 is Ms. Tanya Cornelius. We're here on behalf of</p> <p>18 Cite Court Reporting out of Montgomery, Alabama.</p> <p>19 This is the video deposition of Ms.</p> <p>20 Susan Phillips, which was noticed by attorney</p> <p>21 Cynthia Wilkinson, for the case Hendrix V. CRC</p> <p>22 Insurance Services, Incorporated, et al., filed</p> <p>23 in the U.S. District Court for the Northern</p>	<p>Page 8</p> <p>1 EXAMINATION</p> <p>2 BY MS. PALMER:</p> <p>3 Q. All right. Ms. Phillips, we</p> <p>4 introduced ourselves earlier. My name is Leslie</p> <p>5 Palmer, and I represent Kathryn Phillips --</p> <p>6 Kathryn Hendrix. I'm going to do that all day.</p> <p>7 And we have called you here today for your</p> <p>8 deposition regarding your employment with CRC and</p> <p>9 any information you may have related to Kathryn's</p> <p>10 employment.</p> <p>11 Is it okay if I call you Susan?</p> <p>12 A. Uh-huh (positive response), yes.</p> <p>13 Q. And I'm Leslie. So just -- I don't</p> <p>14 know that I would know who a Ms. Palmer was.</p> <p>15 (Whereupon, Plaintiff's Exhibit No.</p> <p>16 39 was marked for identification and a copy of</p> <p>17 same is attached hereto.)</p> <p>18 Q. I'm going to show you what I have</p> <p>19 previously marked as Plaintiff's Exhibit 39, and</p> <p>20 this is a re-notice of the deposition of Susan</p> <p>21 Phillips. Have you seen this document before?</p> <p>22 A. No.</p> <p>23 Q. Okay. So what this document did was</p>

<p>Page 9</p> <p>1 provide notice to CRC's counsel that we were</p> <p>2 taking your deposition today, January 23rd at</p> <p>3 2:00 p.m.</p> <p>4 If you'll flip for me to the second</p> <p>5 page there at the top, it lists a couple of</p> <p>6 things that we wanted you to bring with you. So</p> <p>7 the first one there is documents used by you to</p> <p>8 prepare for your deposition.</p> <p>9 And I apologize there's a typo there.</p> <p>10 That's what I get for using a form.</p> <p>11 Did you look at any documents before</p> <p>12 coming here today?</p> <p>13 <b>A. Just some texts.</b></p> <p>14 Q. Some text messages? Okay. And</p> <p>15 you'll see that second one is any text messages,</p> <p>16 e-mails, or documents discussing Kathryn Hendrix,</p> <p>17 including her employment, medical leave, or</p> <p>18 complaints.</p> <p>19 So the text messages that you looked</p> <p>20 at, did they involve Kathryn?</p> <p>21 <b>A. They were hers.</b></p> <p>22 Q. Okay. They were from her?</p> <p>23 <b>A. Uh-huh (positive response).</b></p>	<p>Page 11</p> <p>1 <b>A. But other than that, it's been very</b></p> <p>2 <b>nice.</b></p> <p>3 Q. Yeah. Both of my parents recently</p> <p>4 retired, and I feel like it's one extreme or the</p> <p>5 other. I either can't get them to do anything or</p> <p>6 I can't get them to stop. So there's no happy</p> <p>7 medium.</p> <p>8 <b>A. No.</b></p> <p>9 Q. Have you ever given a deposition</p> <p>10 before?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. How many times?</p> <p>13 <b>A. Twice.</b></p> <p>14 Q. Twice, okay. And I'm going to just</p> <p>15 kind of touch on the rules. I'm sure you know</p> <p>16 them since you've done that before, but we have a</p> <p>17 court reporter here today taking down your</p> <p>18 testimony. So we need you to answer audibly,</p> <p>19 okay?</p> <p>20 <b>A. (Witness nods head.)</b></p> <p>21 Q. Is that a yes?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. So that's exactly my point. If I ask</p>
<p>Page 10</p> <p>1 Q. Were you in those text messages,</p> <p>2 texts to and from you?</p> <p>3 <b>A. Talked about but not in.</b></p> <p>4 Q. Did you bring those with you today?</p> <p>5 <b>A. I don't have them.</b></p> <p>6 Q. Okay. Did anybody at CRC ask you to</p> <p>7 check your cellphone to see if you had text</p> <p>8 messages with Kat?</p> <p>9 <b>A. No.</b></p> <p>10 Q. Did anybody ask you to check your</p> <p>11 e-mail at CRC or your personal e-mail to see if</p> <p>12 you had any e-mails related to Kat?</p> <p>13 <b>A. No. But I'm retired.</b></p> <p>14 Q. Okay. When did you retire?</p> <p>15 <b>A. October 2nd.</b></p> <p>16 Q. And I had heard that you had retired.</p> <p>17 I wasn't sure when. Congratulations.</p> <p>18 <b>A. Thank you.</b></p> <p>19 Q. How is retired life?</p> <p>20 <b>A. It's okay as long as I'm busy. It's</b></p> <p>21 <b>when you don't have anything to do that it gets</b></p> <p>22 <b>kind of like, What am I doing here.</b></p> <p>23 Q. I think that's the hard part.</p>	<p>Page 12</p> <p>1 you if that's a yes or if that's a no, I'm not</p> <p>2 trying to be rude. I'm just trying to make sure</p> <p>3 we get a clear record. It's our habit to kind of</p> <p>4 nod or shake our heads.</p> <p>5 <b>A. Yeah.</b></p> <p>6 Q. We also have a videographer here</p> <p>7 today just to make sure that we have the record</p> <p>8 fully preserved, and they're taking it down as</p> <p>9 well.</p> <p>10 So is there any particular reason why</p> <p>11 you wouldn't be able to give truthful and honest</p> <p>12 and complete testimony today?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Okay. Tell me about the other</p> <p>15 depositions that you gave. Were they personal or</p> <p>16 business related?</p> <p>17 <b>A. They were CRC.</b></p> <p>18 Q. CRC. Okay. When -- you said two of</p> <p>19 them?</p> <p>20 <b>A. (Witness nods head.)</b></p> <p>21 Q. Do you recall when the first one was,</p> <p>22 roughly?</p> <p>23 <b>A. Back in the '90s or early 2 -- a long</b></p>

<p style="text-align: right;">Page 13</p> <p>1 time ago.</p> <p>2 Q. Nirvana on the radio and --</p> <p>3 A. Maybe not that long ago, but --</p> <p>4 Q. -- flannel?</p> <p>5 A. -- a long time ago.</p> <p>6 Q. What was the topic of that</p> <p>7 deposition?</p> <p>8 A. They were both insurance agents, E&amp;O.</p> <p>9 One was against CRC, and one was against one of</p> <p>10 my agents. So I was there more as a witness than</p> <p>11 actually being sued myself for CRC.</p> <p>12 Q. And E&amp;O, is that a type of insurance</p> <p>13 coverage?</p> <p>14 A. Errors and omissions, insurance</p> <p>15 agents.</p> <p>16 Q. So were you there because CRC had</p> <p>17 been sued or because CRC had provided coverage?</p> <p>18 A. CRC had been sued because of coverage</p> <p>19 we provided.</p> <p>20 Q. Okay. Sued by an insurer?</p> <p>21 A. An insurer.</p> <p>22 Q. What type of E&amp;O coverage were they</p> <p>23 seeking? Do you remember like what the</p>	<p style="text-align: right;">Page 15</p> <p>1 agent -- it was one of my agents who had placed a</p> <p>2 medical malpractice policy, and the insured chose</p> <p>3 to cancel the policy and purchase a one-year ERP.</p> <p>4 And they had a claim, of course, one year and a</p> <p>5 month after.</p> <p>6 Q. Certainly.</p> <p>7 A. And so they came back against the</p> <p>8 agent, which was just a -- nothing happened.</p> <p>9 Q. Okay. So neither of those had</p> <p>10 anything to do with any employment practices</p> <p>11 liability?</p> <p>12 A. No.</p> <p>13 Q. Okay. Since you retired on October</p> <p>14 2nd, have you had any contact with anybody from</p> <p>15 CRC?</p> <p>16 A. Actually, nobody since my party.</p> <p>17 Q. Goodness. What kind of party did</p> <p>18 they throw you?</p> <p>19 A. It was up at The Club, just a little</p> <p>20 department thing.</p> <p>21 Q. Hopefully they got you a good cake</p> <p>22 from Edgar's.</p> <p>23 A. No. We had good wine, though.</p>
<p style="text-align: right;">Page 14</p> <p>1 underlying claim was?</p> <p>2 A. The underlying claim, there was no</p> <p>3 coverage for their -- for what they wanted</p> <p>4 covered, and so they came back against us and the</p> <p>5 insurance carrier because they didn't have</p> <p>6 coverage.</p> <p>7 Q. Do you recall what they were looking</p> <p>8 to cover, what acts or errors?</p> <p>9 A. They wanted coverage for their</p> <p>10 directors and officers for -- it had to do with</p> <p>11 property, real estate, and the value of what they</p> <p>12 told them they would pay them if other people</p> <p>13 received more money, but they received more money</p> <p>14 because it was based on a side tract and not the</p> <p>15 actual manufacturing facility itself. And so</p> <p>16 they were suing the board of directors for not</p> <p>17 paying them what they thought they were owed.</p> <p>18 Q. Okay.</p> <p>19 A. So then the board came back against</p> <p>20 the RSUI and CRC.</p> <p>21 Q. So was that -- was it similar in both</p> <p>22 lawsuits?</p> <p>23 A. The other one was a -- it was an</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Okay. That's better. Only way it</p> <p>2 could be better if it was both, I think.</p> <p>3 Are you friends with any of them on</p> <p>4 social media, any of the CRC employees?</p> <p>5 A. I don't do social media.</p> <p>6 Q. You don't have social media? Who got</p> <p>7 your book when you retired?</p> <p>8 A. It was all my team. Part of it went</p> <p>9 to -- the medical part went to Lee McClure, and</p> <p>10 the non-medical went to David Sloneker as far as</p> <p>11 I know.</p> <p>12 Q. Okay.</p> <p>13 A. That is what I suggested. I don't</p> <p>14 know what they actually decided.</p> <p>15 Q. Okay. So you made a suggestion --</p> <p>16 A. Yeah.</p> <p>17 Q. -- but you --</p> <p>18 A. I don't know how they divided it up.</p> <p>19 But that was reasonable.</p> <p>20 Q. Okay. And the suggestion that you</p> <p>21 made, did you make that suggestion to Dave and</p> <p>22 Lee?</p> <p>23 A. Uh-huh (positive response).</p>

<p style="text-align: right;">Page 17</p> <p>1 Q. Or to John Cadden?</p> <p>2 <b>A. No. Dave and Lee. It's our team.</b></p> <p>3 Q. Okay. So I have here a -- kind of, I</p> <p>4 guess, a bio of you of when you were at CRC. And</p> <p>5 I'm not going to produce this or anything, but it</p> <p>6 says at this point you had been with the</p> <p>7 professional liability for over twenty-five</p> <p>8 years. How long were you at CRC ultimately?</p> <p>9 <b>A. Thirty-two years and some months.</b></p> <p>10 Q. Wow. Was CRC like your first career</p> <p>11 or did you do something before that?</p> <p>12 <b>A. I was with AIG for ten years before</b></p> <p>13 <b>that, and then my career before that was hotel</b></p> <p>14 <b>restaurant management.</b></p> <p>15 Q. Bless you. When you started at CRC,</p> <p>16 what was the position that you started in?</p> <p>17 <b>A. Account exec -- actually, no.</b></p> <p>18 <b>Technical assistant.</b></p> <p>19 Q. We've heard that a little bit.</p> <p>20 <b>A. We did not have account execs back</b></p> <p>21 <b>then.</b></p> <p>22 Q. Are they basically the same thing?</p> <p>23 Is it --</p>	<p style="text-align: right;">Page 19</p> <p>1 Q. It was just broker?</p> <p>2 <b>A. And even our business cards didn't</b></p> <p>3 <b>have titles on them.</b></p> <p>4 Q. Okay. Did your business card have --</p> <p>5 did it say broker or just said your name?</p> <p>6 <b>A. Susan Phillips.</b></p> <p>7 Q. Okay. Do you remember what year you</p> <p>8 would have moved into the broker position? Just</p> <p>9 roughly.</p> <p>10 <b>A. If I started in '91, it would have</b></p> <p>11 <b>been '92.</b></p> <p>12 Q. Okay. All right. And tell me a</p> <p>13 little bit about that. When you moved into that</p> <p>14 position, what types of accounts did you have?</p> <p>15 <b>A. I had no -- we did not have a -- it</b></p> <p>16 <b>was a starting up new department. Betsy had been</b></p> <p>17 <b>there a couple of years. And I had no book. I</b></p> <p>18 <b>had to develop my own book. And I started pretty</b></p> <p>19 <b>much writing nonprofit D&amp;O is how the book got</b></p> <p>20 <b>started.</b></p> <p>21 THE REPORTER: Say that again.</p> <p>22 THE WITNESS: Nonprofit D&amp;O.</p> <p>23 Q. (BY MS. PALMER:) Okay. So that</p>
<p style="text-align: right;">Page 18</p> <p>1 <b>A. No. A technical -- you're talking</b></p> <p>2 <b>back in the '90s.</b></p> <p>3 Q. I know.</p> <p>4 <b>A. It was an assistant position.</b></p> <p>5 Q. What we would kind of consider like a</p> <p>6 true secretarial type?</p> <p>7 <b>A. No. It was processing quotes and</b></p> <p>8 <b>binders and surplus lines and --</b></p> <p>9 Q. Is that what the account execs kind</p> <p>10 of do now?</p> <p>11 <b>A. Yeah.</b></p> <p>12 Q. Yeah? Did you move -- when did you</p> <p>13 move -- obviously, you did move up. When did you</p> <p>14 move up from the technical assistant?</p> <p>15 <b>A. One year. I moved to the</b></p> <p>16 <b>professional department as a broker.</b></p> <p>17 Q. And we've heard a little bit of</p> <p>18 testimony in some other depositions about inside</p> <p>19 brokers, associate brokers, senior brokers. Did</p> <p>20 you -- you moved in as like a full on broker, no</p> <p>21 word before it, right?</p> <p>22 <b>A. We did not have those titles back</b></p> <p>23 <b>then.</b></p>	<p style="text-align: right;">Page 20</p> <p>1 would have been you going out and just drumming</p> <p>2 up business, right?</p> <p>3 <b>A. Uh-huh (positive response).</b></p> <p>4 <b>Primarily the Southeast.</b></p> <p>5 Q. Did that require a lot of travel?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. I guess that was before prevalent</p> <p>8 e-mail days and Zoom meetings?</p> <p>9 <b>A. This was back with the Yellow Book</b></p> <p>10 <b>and Yellow Pages, and you go find agents and go</b></p> <p>11 <b>call on them.</b></p> <p>12 Q. So when you started working there,</p> <p>13 were you working under Betsy?</p> <p>14 <b>A. Uh-huh (positive response).</b></p> <p>15 Q. Okay. So was Betsy --</p> <p>16 MS. BARLOTTA: Is that a yes?</p> <p>17 <b>A. Yes, Betsy Barnett, yes.</b></p> <p>18 Q. So was Betsy over the professional</p> <p>19 liability department?</p> <p>20 <b>A. We were the department.</b></p> <p>21 Q. Okay. So you and Betsy. Was anybody</p> <p>22 else in the professional liability department?</p> <p>23 <b>A. There was one assistant. Betsy had</b></p>

<p style="text-align: right;">Page 21</p> <p>1 <b>an assistant.</b></p> <p>2 Q. Okay. And where did the department</p> <p>3 move from there? Do you remember who you brought</p> <p>4 in next?</p> <p>5 <b>A. No.</b></p> <p>6 Q. At some point we know that it became</p> <p>7 what it is now.</p> <p>8 <b>A. Uh-huh (positive response).</b></p> <p>9 Q. And in 2017, '18, when Kathryn was</p> <p>10 there, we know a little bit about the makeup</p> <p>11 there.</p> <p>12 Is there anybody between when you</p> <p>13 started the department with Betsy and 2017 who</p> <p>14 stands out to you as I know when we brought this</p> <p>15 person in, and this was their job?</p> <p>16 MS. BARLOTTA: Object to the form.</p> <p>17 <b>A. No. I mean -- no.</b></p> <p>18 Q. Okay.</p> <p>19 <b>A. There was very little turnover.</b></p> <p>20 Q. Just kind of adding people as you</p> <p>21 grew?</p> <p>22 <b>A. Uh-huh (positive response).</b></p> <p>23 Q. Okay. When did Rusty Hughes join the</p>	<p style="text-align: right;">Page 23</p> <p>1 Q. Okay.</p> <p>2 <b>A. There was our team, Lee and Dave and</b></p> <p>3 <b>Susan, and then James Powell, and then Trey</b></p> <p>4 <b>Reich, Rusty, Corey. That's only like five. Oh,</b></p> <p>5 <b>they may be counting underwriting. We have an</b></p> <p>6 <b>underwriting department.</b></p> <p>7 Q. Okay.</p> <p>8 <b>A. That's all I can think of.</b></p> <p>9 Q. Okay. Are you familiar with the</p> <p>10 launch program that the brokers use?</p> <p>11 <b>A. I know it's new, and I think it's a</b></p> <p>12 <b>developmental program, but --</b></p> <p>13 Q. No experience?</p> <p>14 <b>A. No.</b></p> <p>15 Q. Do you have any knowledge of who the</p> <p>16 Birmingham office has put into the launch</p> <p>17 program?</p> <p>18 <b>A. No.</b></p> <p>19 MS. BARLOTTA: Object to form. Let</p> <p>20 me get my objection in.</p> <p>21 THE WITNESS: Do what?</p> <p>22 MS. BARLOTTA: Just pause a minute</p> <p>23 and let me get my objection in.</p>
<p style="text-align: right;">Page 22</p> <p>1 department?</p> <p>2 <b>A. I don't know. He started out as</b></p> <p>3 <b>Betsy's assistant.</b></p> <p>4 Q. Okay. Was Rusty the assistant that</p> <p>5 you mentioned when the department first started?</p> <p>6 <b>A. No, no.</b></p> <p>7 Q. Okay.</p> <p>8 <b>A. Her name was Amy.</b></p> <p>9 Q. Okay. What about John Cadden? Was</p> <p>10 he ever part of that department?</p> <p>11 <b>A. No.</b></p> <p>12 Q. So we heard testimony from Rusty --</p> <p>13 we heard testimony from Rusty last week about</p> <p>14 there being seven teams in the professional</p> <p>15 department. Does that sound about right in, say,</p> <p>16 2019?</p> <p>17 <b>A. Probably. I worked remote since</b></p> <p>18 <b>2016, but I -- yes, very proud of them, and yes.</b></p> <p>19 Q. Okay. So would you be able to tell</p> <p>20 me who those seven teams were as far as the</p> <p>21 leadership of the teams?</p> <p>22 MS. BARLOTTA: Object to form.</p> <p>23 <b>A. I'll do the best I can.</b></p>	<p style="text-align: right;">Page 24</p> <p>1 THE WITNESS: I'm sorry.</p> <p>2 MS. BARLOTTA: No, you're not doing</p> <p>3 anything wrong, just to make the record clear.</p> <p>4 THE WITNESS: That was easy.</p> <p>5 Q. (BY MS. PALMER:) You made reference</p> <p>6 a couple of times about our team, and I know that</p> <p>7 it was you and Dave, and then at some point Lee</p> <p>8 McClure joined; is that correct?</p> <p>9 <b>A. Correct.</b></p> <p>10 Q. Okay. And so when we were speaking</p> <p>11 with Rusty last week, it seemed as though Lee</p> <p>12 came in, and you guys decided Lee would be the</p> <p>13 team leader; is that accurate?</p> <p>14 <b>A. After many years. That was just --</b></p> <p>15 <b>yes. It was Dave and myself, and Lee joined my</b></p> <p>16 <b>team because the broker he was working with left.</b></p> <p>17 Q. Okay. So take me there and tell me</p> <p>18 like how did that happen? How did you end up</p> <p>19 teamed up with Dave, and then how did you end up</p> <p>20 bringing Lee in?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. Okay.</b></p> <p>23 MS. BARLOTTA: You can answer.</p>



<p style="text-align: right;">Page 25</p> <p>1 Q. Yeah, how did you end up teamed up 2 with Dave first? 3 MS. BARLOTTA: Same objection. You 4 can answer. 5 <b>A. Okay. Neither one of our books were</b> 6 <b>-- we needed a group to -- so we could have, you</b> 7 <b>know -- we didn't have enough production to be</b> 8 <b>individual, so they put us together, which worked</b> 9 <b>out well. And we were like that for -- I can't</b> 10 <b>tell you when we started, but for many years.</b> 11 Q. Do you know who made the decision to 12 put you and Dave together? 13 <b>A. Oh, we did. I think it was probably</b> 14 <b>Betsy -- I don't remember if it was Betsy or</b> 15 <b>Rusty, but just between us, we decided it would</b> 16 <b>be better if we were together.</b> 17 Q. Okay. And at some point, they also 18 brought Lee in; is that correct? 19 MS. BARLOTTA: Object to the form. 20 <b>A. Lee worked for another broker who</b> 21 <b>quit, and so they needed to find a place to put</b> 22 <b>Lee, so they asked me to take Lee on my team.</b> 23 Q. Okay. Why would they need to find a</p>	<p style="text-align: right;">Page 27</p> <p>1 <b>recently, because my retirement has kind of been</b> 2 <b>coming, you know.</b> 3 Q. Okay. 4 <b>A. It's been in the works. And so he</b> 5 <b>was always going to take over the team.</b> 6 Q. Okay. 7 <b>A. It was just a matter of when we did</b> 8 <b>it.</b> 9 Q. Okay. And so before 2019 or 2020, 10 you were the team lead? 11 <b>A. Dave and I were together.</b> 12 Q. Co? 13 <b>A. Uh-huh (positive response).</b> 14 Q. Okay. So as the co-team leads prior 15 to 2019, would it be up to you and Dave to 16 determine how bonuses were distributed on your 17 team? 18 <b>A. We would each do our own.</b> 19 Q. Okay. How do you determine who you 20 give bonuses to if you're co-leads? Like -- 21 <b>A. He had a bucket for his production,</b> 22 <b>and I had a bucket for my production.</b> 23 Q. Okay.</p>
<p style="text-align: right;">Page 26</p> <p>1 place to put Lee? Was he not a full broker? 2 <b>A. Correct.</b> 3 Q. Okay. What would have been his 4 position when he first joined your team? 5 <b>A. Broker.</b> 6 Q. Okay. But maybe back into that 7 assistant broker, senior broker, whatever that 8 was? 9 MS. BARLOTTA: Object to the form. 10 <b>A. I can't help you.</b> 11 Q. How long did Lee work on your team 12 before he became the team leader? 13 <b>A. Oh, he just became -- probably three</b> 14 <b>or four years.</b> 15 Q. Do you remember what year he would 16 have joined your team? 17 <b>A. No.</b> 18 Q. Are we talking recently that he 19 became the leader, like -- 20 <b>A. Uh-huh (positive response).</b> 21 Q. -- 2015 or -- 22 <b>A. Oh, no. He only became the leader</b> 23 <b>'19 or '20, maybe even during Covid. Just</b></p>	<p style="text-align: right;">Page 28</p> <p>1 <b>A. So we each had a set amount of money.</b> 2 <b>So we didn't commingle --</b> 3 Q. Your revenues? 4 <b>A. -- our revenues.</b> 5 Q. Okay. That makes sense. And did you 6 have staff that was just your staff or did you 7 also share staff among the team? 8 <b>A. Dave had his staff, and I had my</b> 9 <b>staff.</b> 10 Q. Okay. Who was your staff? And I'm 11 talking about 2017 to '19. 12 <b>A. Well, back then, it probably would</b> 13 <b>have just been Rhonda Brasher and Lee.</b> 14 Q. Okay. And so if Lee was on your 15 staff, would Lee have his own revenue pool or 16 would his be under your bucket? 17 <b>A. His would be under my book.</b> 18 Q. Okay. And do you recall during that 19 same time period who was on Dave's staff? 20 <b>A. He just had Vandalyn, and he hired</b> 21 <b>somebody, but I don't know when he hired him. I</b> 22 <b>think Brandon. I don't know when he was actually</b> 23 <b>hired.</b></p>

<p style="text-align: right;">Page 29</p> <p>1 Q. Brandon Hayes?</p> <p>2 <b>A. Yeah. But I don't know when he</b></p> <p>3 <b>entered the picture.</b></p> <p>4 Q. Okay. Do you recall what position he</p> <p>5 hired Brandon Hayes for?</p> <p>6 <b>A. A broker.</b></p> <p>7 Q. Would that be -- you said that the</p> <p>8 two of you joined up because your --</p> <p>9 <b>A. Production wasn't high.</b></p> <p>10 Q. Production, right. So would it be</p> <p>11 usual to hire someone in as a broker if your</p> <p>12 production wasn't high enough to be on your own?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 <b>A. They were trying to develop more</b></p> <p>15 <b>business and get production.</b></p> <p>16 Q. Did -- how did you calculate the</p> <p>17 bonuses that you would distribute from your</p> <p>18 bucket? Is there like a set -- I guess, factors</p> <p>19 that you look at?</p> <p>20 <b>A. No. For Rhonda, it was based on</b></p> <p>21 <b>showing up at work, doing a good job, not making</b></p> <p>22 <b>mistakes, being a reliable employee.</b></p> <p>23 <b>Lee was based more on his production</b></p>	<p style="text-align: right;">Page 31</p> <p>1 <b>then by then you have all your results, and you</b></p> <p>2 <b>can, you know, do a little bit better.</b></p> <p>3 Q. And do you recall what the largest</p> <p>4 bonus that Lee would have received when he was</p> <p>5 under your bucket?</p> <p>6 MS. BARLOTTA: Object to the form.</p> <p>7 <b>A. No.</b></p> <p>8 Q. Would it have been larger or smaller</p> <p>9 than two hundred?</p> <p>10 <b>A. Smaller.</b></p> <p>11 Q. Larger or smaller than a hundred?</p> <p>12 <b>A. Between both of the times, it could</b></p> <p>13 <b>have been more than that.</b></p> <p>14 Q. Okay.</p> <p>15 <b>A. But it was based on his production.</b></p> <p>16 Q. How was that production tracked?</p> <p>17 <b>A. By how it was coded in the system.</b></p> <p>18 Q. Is that that AIMS system --</p> <p>19 <b>A. Uh-huh (positive response).</b></p> <p>20 MS. BARLOTTA: Object to the form.</p> <p>21 Q. -- that CRC has?</p> <p>22 MS. BARLOTTA: Object to the form.</p> <p>23 <b>A. Yes.</b></p>
<p style="text-align: right;">Page 30</p> <p>1 <b>and a percentage of that. But hers was not based</b></p> <p>2 <b>on production.</b></p> <p>3 Q. Okay. And was she a -- was Rhonda an</p> <p>4 account executive?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Did you have Rhonda doing any</p> <p>7 brokering?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Is that the correct term?</p> <p>10 <b>A. It is, but no.</b></p> <p>11 Q. Okay. Do you recall the -- and it</p> <p>12 can be an estimate, but the largest bonus that</p> <p>13 you ever paid Rhonda?</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 <b>A. Fifty, sixty thousand.</b></p> <p>16 Q. Okay. And that would be that</p> <p>17 biannual bonus?</p> <p>18 <b>A. That would be total together.</b></p> <p>19 Q. Total. Okay. So maybe twenty-five</p> <p>20 each time?</p> <p>21 <b>A. Or something, depending on -- you</b></p> <p>22 <b>know, the first one is usually a little bit lower</b></p> <p>23 <b>to cover for the second half of the year, and</b></p>	<p style="text-align: right;">Page 32</p> <p>1 Q. And so when Lee would work on a</p> <p>2 matter, would he go into the system and code it a</p> <p>3 certain way?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. It would be Susan, Lee -- and Lee, or</b></p> <p>6 <b>Susan, Lee, and Lauren.</b></p> <p>7 Q. Okay.</p> <p>8 <b>A. Lee would have been that second spot.</b></p> <p>9 Q. Okay. So Lauren, who is Lauren?</p> <p>10 <b>A. She worked with Lee on his accounts.</b></p> <p>11 Q. And since he just became the team</p> <p>12 lead in 2019, when Lauren was on Lee's accounts,</p> <p>13 would those accounts of Lee's still be considered</p> <p>14 your accounts as well?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Kind of like an upstream?</p> <p>18 <b>A. (Witness nods head.)</b></p> <p>19 MS. BARLOTTA: Object.</p> <p>20 Q. Is that a yes?</p> <p>21 <b>A. Yes, in between the objection.</b></p> <p>22 Q. Would there be a way for Lauren to be</p> <p>23 listed in that AIMS system as working on an</p>

<p>Page 33</p> <p>1 account?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 <b>A. She would be listed in the third spot</b></p> <p>4 <b>as the assistant on the account.</b></p> <p>5 Q. Okay. What would it take for her to</p> <p>6 be able to be listed in the second spot?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 <b>A. To be a broker with her own book.</b></p> <p>9 Q. And when you say a broker with her</p> <p>10 own book, could that be a book that someone</p> <p>11 passed off to her, like accounts that she was</p> <p>12 wholly managing?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 <b>A. On our team, no. She would have</b></p> <p>15 <b>stayed in that third spot, because those are</b></p> <p>16 <b>Lee's accounts that she's working.</b></p> <p>17 Q. Okay.</p> <p>18 <b>A. So on my team, she would have been in</b></p> <p>19 <b>that third spot.</b></p> <p>20 Q. Okay. And then after 2019 when Lee</p> <p>21 became the team lead, could Lauren have slid into</p> <p>22 that second spot at that point?</p> <p>23 MS. BARLOTTA: Object to form.</p>	<p>Page 35</p> <p>1 cases? I say cases like --</p> <p>2 <b>A. Yeah, like you're a life insurance</b></p> <p>3 <b>agent. I referred him some accounts.</b></p> <p>4 Q. Okay.</p> <p>5 <b>A. To help him get developed. Again, as</b></p> <p>6 <b>I'm moving on and getting ready to set up my</b></p> <p>7 <b>retirement, trying to help him, I would throw him</b></p> <p>8 <b>some new business or maybe a new agent that I</b></p> <p>9 <b>thought he might be interested in working with.</b></p> <p>10 Q. Okay. And so in throwing him some</p> <p>11 accounts, is the purpose of that twofold, like</p> <p>12 one is to help him develop his book; and two, to</p> <p>13 keep it within your team with Dave?</p> <p>14 <b>A. Yeah. It would have always stayed on</b></p> <p>15 <b>our team, but it was just kind of to help him get</b></p> <p>16 <b>started or get some accounts to work on and</b></p> <p>17 <b>figure out how to work on them.</b></p> <p>18 Q. Okay. So kind of help him progress</p> <p>19 through the industry?</p> <p>20 <b>A. Uh-huh (positive response), yes.</b></p> <p>21 Q. Who is Truitt Taylor?</p> <p>22 <b>A. He was my -- he came -- he was one of</b></p> <p>23 <b>my brokers.</b></p>
<p>Page 34</p> <p>1 <b>A. I don't know how he set it up with</b></p> <p>2 <b>her. I don't know.</b></p> <p>3 Q. Okay. So that would be a specific</p> <p>4 deal between the two of them?</p> <p>5 <b>A. Yeah.</b></p> <p>6 Q. Okay. Did you have any say in the</p> <p>7 hiring of Brandon Hayes?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Did anybody ask you if they needed</p> <p>10 another associate broker?</p> <p>11 <b>A. No.</b></p> <p>12 Q. Did you get to interview him?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Would you have liked to interview</p> <p>15 him?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Did you have any involvement in</p> <p>18 setting his bonuses?</p> <p>19 <b>A. No.</b></p> <p>20 Q. And that's because he was on Dave's</p> <p>21 bucket?</p> <p>22 <b>A. (Witness nods head.)</b></p> <p>23 Q. Did Brandon ever work on any of your</p>	<p>Page 36</p> <p>1 Q. Okay. So do you remember what years</p> <p>2 he would have been a broker under you?</p> <p>3 <b>A. No. We hired him right out of</b></p> <p>4 <b>college, and I did not even really interview him.</b></p> <p>5 <b>He was given to me.</b></p> <p>6 Q. Okay. Who interviewed him? Do you</p> <p>7 know?</p> <p>8 <b>A. Probably Tom Curtain and Betsy</b></p> <p>9 <b>Barnett. And I did eventually, but they did all</b></p> <p>10 <b>the, is he okay, you know, and do we want him on</b></p> <p>11 <b>our team or did we want him at CRC.</b></p> <p>12 Q. And do you get the final like, Okay,</p> <p>13 we had lunch, he's good, he can come on?</p> <p>14 <b>A. Yeah. And if I hadn't taken him, he</b></p> <p>15 <b>probably would have gone with another team. CRC</b></p> <p>16 <b>wanted him.</b></p> <p>17 Q. Okay. Is that how it generally would</p> <p>18 work at CRC is someone higher up would say, We</p> <p>19 are going to bring in this person, do you want</p> <p>20 them?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. If you had an opening or, you know,</b></p> <p>23 <b>if they knew I needed help or something, yes, or</b></p>

<p>Page 37</p> <p>1 they thought I would be good at developing that</p> <p>2 person --</p> <p>3 Q. Okay.</p> <p>4 A. -- they would come and ask.</p> <p>5 Q. Did they ever -- I'm sorry. Let me</p> <p>6 be more specific. Did CRC ever make any effort</p> <p>7 to specifically place a female broker with you?</p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 A. I don't know. I never interviewed</p> <p>10 any.</p> <p>11 Q. Okay. And as far as you know, no one</p> <p>12 asked you --</p> <p>13 A. No.</p> <p>14 Q. -- about --</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 Q. What is Truitt Taylor's position now?</p> <p>17 A. He is a senior broker, very</p> <p>18 successful.</p> <p>19 Q. And he has his own team?</p> <p>20 A. Uh-huh (positive response).</p> <p>21 Q. Is that a yes?</p> <p>22 A. Yes. I'm sorry. Yes.</p> <p>23 Q. That's okay. How long was Truitt</p>	<p>Page 39</p> <p>1 A. It could go both ways.</p> <p>2 Q. So there's no set policy?</p> <p>3 A. No.</p> <p>4 Q. One of the types of insurance you</p> <p>5 sold or brokered -- is that the right word,</p> <p>6 brokered?</p> <p>7 A. Either one.</p> <p>8 Q. Is EPL insurance, right?</p> <p>9 A. Uh-huh (positive response).</p> <p>10 Q. And what is EPL insurance?</p> <p>11 A. Employment practices liability.</p> <p>12 Q. What types of liability would EPL</p> <p>13 insurance cover?</p> <p>14 A. Can you restate that or --</p> <p>15 Q. Yeah, yeah. So as a broker, were you</p> <p>16 aware of the products that you were selling?</p> <p>17 Like would you read the policies?</p> <p>18 A. Oh, we did. We were the first</p> <p>19 wholesale broker to sell employment practices.</p> <p>20 Q. Okay. And so what types of claims</p> <p>21 would generally be made under the employment</p> <p>22 practices policies?</p> <p>23 MS. BARLOTTA: Object to form.</p>
<p>Page 38</p> <p>1 under your tutelage before he moved on to his own</p> <p>2 team?</p> <p>3 A. Probably five or six years.</p> <p>4 Q. Is that an average span or was he a</p> <p>5 higher performer?</p> <p>6 MS. BARLOTTA: Object to form.</p> <p>7 A. I don't know what the average would</p> <p>8 be. Some still are on the same teams. They</p> <p>9 don't ever spin out.</p> <p>10 Q. Okay. What does a broker have to do</p> <p>11 to spin out at CRC?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 A. Have a book of business to support</p> <p>14 himself or herself.</p> <p>15 Q. Okay. And is there a particular</p> <p>16 dollar amount that goes along with that?</p> <p>17 A. No.</p> <p>18 Q. In your experience at CRC, is that</p> <p>19 something -- spinning out, is that something that</p> <p>20 like upper management would come and ask, Hey, do</p> <p>21 you want your own team, or would the person have</p> <p>22 to ask upper management?</p> <p>23 MS. BARLOTTA: Object to form.</p>	<p>Page 40</p> <p>1 A. Discrimination was probably the</p> <p>2 biggest one.</p> <p>3 Q. Okay. And what do you understand</p> <p>4 discrimination to be?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 A. It could be discrimination of race,</p> <p>7 age, all types of discrimination, that you feel</p> <p>8 you have not been given a fair chance, you were</p> <p>9 discriminated against.</p> <p>10 Q. Would a denial of opportunities fall</p> <p>11 into discrimination in your opinion?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 A. I think it would be a covered claim.</p> <p>14 Q. I'm going to show you what has</p> <p>15 previously been marked as Exhibit 23.</p> <p>16 MS. PALMER: And, Rachel, this is</p> <p>17 that small bonus thing. So I'm going to also</p> <p>18 show her on my iPad so that she can zoom in.</p> <p>19 MS. BARLOTTA: Okay.</p> <p>20 MS. PALMER: And it's just this --</p> <p>21 it's four pages. It's Bates labels 4995, 6, 7,</p> <p>22 and 8. Yeah.</p> <p>23 Q. (BY MS. PALMER:) So, Susan, if</p>

<p style="text-align: right;">Page 41</p> <p>1 you'll hold onto my iPad for me for a second, and</p> <p>2 this is Plaintiff's Exhibit 23. It's the same.</p> <p>3 Do you see that that's the same document?</p> <p>4 <b>A. (No response.)</b></p> <p>5 Q. Do you see that's the same document,</p> <p>6 Susan?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. And I've given it to you on my iPad</p> <p>9 because the print on the paper copy is so small.</p> <p>10 <b>A. Uh-huh (positive response).</b></p> <p>11 Q. So feel free, you can use two fingers</p> <p>12 to kind of zoom in and out on that document.</p> <p>13 Have you seen anything like that document before,</p> <p>14 like Plaintiff's Exhibit 23?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. Yes, for my team.</b></p> <p>17 Q. Okay. And is Plaintiff's Exhibit 23</p> <p>18 the -- how you would calculate the bonuses for</p> <p>19 your pool?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Do what?</b></p> <p>22 Q. Like how you would calculate the</p> <p>23 bonuses to come from your bucket to your team?</p>	<p style="text-align: right;">Page 43</p> <p>1 <b>A. This basically just tells you what</b></p> <p>2 <b>you have to spend.</b></p> <p>3 Q. Okay. Take a look for me back at</p> <p>4 that first page if you would. The bonuses that</p> <p>5 are listed there in the handwriting in the last</p> <p>6 column, does that seem pretty normal to you? Are</p> <p>7 those numbers that --</p> <p>8 <b>A. I don't have any -- it's not relative</b></p> <p>9 <b>to me. I don't know what it's relative to or how</b></p> <p>10 <b>they decide. I don't know how he decided.</b></p> <p>11 Q. Did the teams talk about bonuses with</p> <p>12 each other?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Did the brokers talk about revenues</p> <p>15 with each other?</p> <p>16 <b>A. Well, that was public information.</b></p> <p>17 Q. Okay.</p> <p>18 <b>A. I mean, you could see what every</b></p> <p>19 <b>broker produced, what that total revenue was.</b></p> <p>20 Q. Okay. Thank you.</p> <p>21 <b>A. And that was available on their</b></p> <p>22 <b>computer system.</b></p> <p>23 Q. On like the dashboard?</p>
<p style="text-align: right;">Page 42</p> <p>1 <b>A. This is just where you write it down</b></p> <p>2 <b>at.</b></p> <p>3 Q. Okay. How would you keep your</p> <p>4 documents? Like was it always a paper copy or</p> <p>5 was it on the computer?</p> <p>6 <b>A. It evolved over time.</b></p> <p>7 Q. Okay. Most recently, let's say from</p> <p>8 2017.</p> <p>9 <b>A. It was on the computer.</b></p> <p>10 Q. Okay. Was that document saved to a</p> <p>11 server or like on the computer or in an e-mail?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. I would complete it and forward it to</b></p> <p>14 <b>Rusty and John Cadden.</b></p> <p>15 Q. Okay. And the numbers that you used</p> <p>16 to complete the form -- flip for me to the second</p> <p>17 page. And that's the one that I said is so tiny.</p> <p>18 Are those numbers on that second page provided by</p> <p>19 Truist or BB&amp;T?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. And then from the second page, you</p> <p>22 would determine what to put on that first page,</p> <p>23 right?</p>	<p style="text-align: right;">Page 44</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. Yeah.</b></p> <p>3 Q. So because you and Dave were on the</p> <p>4 same team, was your revenue tracked separately</p> <p>5 because of that spot one in the AIMS system? You</p> <p>6 said there was spot one, spot two?</p> <p>7 <b>A. Uh-huh (positive response).</b></p> <p>8 Q. So yours would be in one, and Dave --</p> <p>9 <b>A. Yeah, and Susan would be the -- I</b></p> <p>10 <b>don't even remember what it was, the first slot.</b></p> <p>11 Q. So Susan, Dave, and Lee -- no, no,</p> <p>12 no. I'm sorry. Lee would be under you.</p> <p>13 <b>A. It would be Susan, Lee, Rhonda or</b></p> <p>14 <b>Susan, Lee, Lauren or --</b></p> <p>15 Q. And then Dave would be Dave whoever?</p> <p>16 <b>A. Dave, Vandalyn.</b></p> <p>17 Q. Were there any that you and Dave were</p> <p>18 on together?</p> <p>19 <b>A. No.</b></p> <p>20 Q. Do you recall taking any</p> <p>21 discrimination or diversity training through</p> <p>22 BB&amp;T?</p> <p>23 <b>A. Yes.</b></p>

<p style="text-align: right;">Page 45</p> <p>1 Q. Okay. And what type of training 2 would that be? 3 <b>A. Both that you mentioned.</b> 4 Q. Okay. Was it classes that you sat 5 through? 6 <b>A. They were online.</b> 7 Q. Like click-through modules? 8 <b>A. Yes.</b> 9 Q. I'm going to show you what we've 10 already marked as Plaintiff's Exhibit 36. Does 11 that exhibit -- does Plaintiff's Exhibit 36 look 12 like one of those modules you might have sat 13 through? 14 <b>A. Something like this, but I don't know</b> 15 <b>that this was exactly how ours was set up, that</b> 16 <b>Insights. But definitely they had diversity, and</b> 17 <b>they had discrimination and money laundering.</b> 18 Q. All that sort of annual training? 19 <b>A. Yeah. But this looks a little bit</b> 20 <b>different from what I remember. But yes, I did</b> 21 <b>have them.</b> 22 Q. Okay. Well, hang on to that for me 23 if you would, please.</p>	<p style="text-align: right;">Page 47</p> <p>1 <b>A. Inclusion of all, you know, that</b> 2 <b>diversity means that everyone is different, and</b> 3 <b>it's okay to include them all.</b> 4 Q. How do you feel about the diversity 5 at CRC? 6 MS. BARLOTTA: Object to form. 7 <b>A. I have not been there since 2016, so</b> 8 <b>I really --</b> 9 Q. Okay. 10 <b>A. -- can't answer that.</b> 11 Q. So what about when you were there in 12 2016? Did you feel like it was a diverse place 13 then? 14 MS. BARLOTTA: Object to form. 15 <b>A. Diverse meaning --</b> 16 Q. What you defined it to be, inclusion 17 of everyone. 18 <b>A. Yeah.</b> 19 Q. Did you feel like CRC made an effort 20 to make sure that there was diversity represented 21 at every stage of employment? 22 MS. BARLOTTA: Object to form. 23 <b>A. I don't know.</b></p>
<p style="text-align: right;">Page 46</p> <p>1 <b>A. Okay.</b> 2 Q. And when I call out a Bates number, 3 I'm talking about those numbers that are down in 4 the bottom right-hand corner, and that's just 5 going to help us identify on the record what 6 pages we're talking about, okay? 7 So flip for me if you will to Bates 8 Number 5207. And it's about four pages back. 9 <b>A. Uh-huh (positive response).</b> 10 Q. There on the bottom slide, there's a 11 quote, and it says: Diversity is being asked to 12 the party. Inclusion is being asked to dance. 13 Have you ever heard anything like 14 that before? 15 <b>A. Not that I remember.</b> 16 Q. Okay. Do you understand -- do you 17 have a personal understanding of the difference 18 in diversity and inclusion? 19 MS. BARLOTTA: Object to form. 20 <b>A. I haven't thought about it.</b> 21 Q. What do you understand diversity to 22 mean? 23 MS. BARLOTTA: Object to the form.</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. Flip for me to Page 5209. It's two 2 more pages back from where you are. There on the 3 top section, it's talking about barriers to 4 diversity. And in the center section there under 5 Poor Interviewing Skills, it says: We don't try 6 to conduct poor interviews, but our own 7 stereotypes and biases can get in our way. 8 Do you agree with that statement? 9 MS. BARLOTTA: Object to form. 10 <b>A. I don't think so.</b> 11 Q. You don't think that stereotypes and 12 biases can get in the way of promoting diversity? 13 MS. BARLOTTA: Object to form. 14 <b>A. I did very little interviewing, so I</b> 15 <b>probably don't have the interview skills to even</b> 16 <b>do the interviewing.</b> 17 Q. Understood. 18 <b>A. Yeah.</b> 19 Q. And thank you for correcting that. 20 <b>A. Because I don't -- I mean, I --</b> 21 Q. Yeah, I'm not talking about -- 22 <b>A. I would hope myself that I -- that</b> 23 <b>doesn't make sense, but --</b></p>



<p>Page 49</p> <p>1 Q. Right. And I'm not talking about you</p> <p>2 interviewing anyone. I'm just wondering if you</p> <p>3 agree that stereotypes can sometimes get in the</p> <p>4 way of promoting diversity?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. I don't know.</b></p> <p>7 Q. You've been in the brokerage --</p> <p>8 wholesale insurance brokerage business for over</p> <p>9 thirty years.</p> <p>10 <b>A. Uh-huh (positive response).</b></p> <p>11 Q. Is it a safe statement to say that</p> <p>12 that is or was a predominantly male industry?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 <b>A. That's pretty safe to say.</b></p> <p>15 Q. And as a female who rose through the</p> <p>16 ranks there --</p> <p>17 <b>A. Uh-huh (positive response).</b></p> <p>18 Q. -- what types of stereotypes did you</p> <p>19 experience throughout your career?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. I don't -- I can't really name any.</b></p> <p>22 Q. Did you feel like you were always</p> <p>23 included in opportunities?</p>	<p>Page 51</p> <p>1 <b>but there was a little perpetuation program that</b></p> <p>2 <b>stayed within our team. I remember that.</b></p> <p>3 Q. Do you remember George?</p> <p>4 <b>A. Bennett.</b></p> <p>5 Q. George Bennett?</p> <p>6 <b>A. Uh-huh (positive response).</b></p> <p>7 Q. Who was George Bennett?</p> <p>8 <b>A. He was a broker they hired.</b></p> <p>9 Q. What -- do you remember what</p> <p>10 department he brokered in?</p> <p>11 <b>A. Professional, with us.</b></p> <p>12 Q. And did George Bennett leave at some</p> <p>13 point?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. When George Bennett left, what</p> <p>16 happened to his book?</p> <p>17 <b>A. It went to Rusty's team.</b></p> <p>18 Q. Did anybody ask if you were</p> <p>19 interested in any of those agents?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. No.</b></p> <p>22 Q. Would you have been interested in any</p> <p>23 of those agents?</p>
<p>Page 50</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. What's an opportunity?</b></p> <p>3 Q. Networking. Were you always invited</p> <p>4 to the networking events?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. From the beginning?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Did you feel as though you were given</p> <p>9 your fair shake as far as agencies?</p> <p>10 MS. BARLOTTA: Object to form.</p> <p>11 <b>A. I had to go find my own agents.</b></p> <p>12 Q. I understand.</p> <p>13 <b>A. So yes.</b></p> <p>14 Q. While you were at CRC, did you</p> <p>15 experience other agents being given books from</p> <p>16 brokers that were leaving or moving on?</p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 <b>A. No, because we never had many leave.</b></p> <p>19 Q. When Betsy Barnett left, what</p> <p>20 happened to her book?</p> <p>21 <b>A. She had three young -- two men, James</b></p> <p>22 <b>and Rusty, and they basically handled the book.</b></p> <p>23 <b>How they divided it up, I don't remember or know,</b></p>	<p>Page 52</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. No.</b></p> <p>3 Q. Why not?</p> <p>4 <b>A. We all have our relationships with</b></p> <p>5 <b>our agents, and I don't think I would have gotten</b></p> <p>6 <b>along very well with his agents.</b></p> <p>7 Q. Why so?</p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 <b>A. People work differently. They</b></p> <p>10 <b>establish their own relationships, and it's hard</b></p> <p>11 <b>to go in and pick up someone else's relationship.</b></p> <p>12 <b>So no. And I had at that time plenty of my own</b></p> <p>13 <b>book to worry with.</b></p> <p>14 Q. So one of the comments we hear a lot</p> <p>15 is like the customer is always right?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Do you think that that's an accurate</p> <p>18 statement in a sales industry like insurance</p> <p>19 brokerage?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. And while you were at CRC, did you</p> <p>23 have any experience with particular agents not</p>

<p>Page 53</p> <p>1 wanting to deal with a female broker?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 <b>A. I don't know. I mean, I went out and</b></p> <p>4 <b>got my own agents. It's not like someone said, I</b></p> <p>5 <b>don't want to work with you because you're</b></p> <p>6 <b>female, so I don't know.</b></p> <p>7 Q. Did you feel as though you were ever</p> <p>8 being overlooked because someone just didn't want</p> <p>9 you in the room?</p> <p>10 MS. BARLOTTA: Object to form.</p> <p>11 <b>A. Maybe, but I don't think it's because</b></p> <p>12 <b>I was a female.</b></p> <p>13 Q. Okay. Why was it?</p> <p>14 <b>A. Maybe they didn't like what I had to</b></p> <p>15 <b>say or how I said it or, you know, I give them a</b></p> <p>16 <b>bad premium or bad coverage, and they didn't like</b></p> <p>17 <b>it. So I don't take it that it was because I was</b></p> <p>18 <b>female.</b></p> <p>19 Q. Okay. So when we're talking about</p> <p>20 stereotypes, is -- would you agree with me that</p> <p>21 in some situations, a female can be judged more</p> <p>22 about something that she said or the way she said</p> <p>23 it versus a male?</p>	<p>Page 55</p> <p>1 with any of the female employees at CRC about</p> <p>2 their desires to move up within the company?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. Yeah. I would promote them if they</b></p> <p>5 <b>wanted to -- I would promote them to talk to</b></p> <p>6 <b>their bosses if they were interested in moving</b></p> <p>7 <b>up, but, you know, there was a small group of us.</b></p> <p>8 <b>There weren't that many, like we sat around and</b></p> <p>9 <b>talked about it all the time.</b></p> <p>10 Q. Right. Tell me a little bit about</p> <p>11 that. Does anybody stand out to you? And I have</p> <p>12 a list here somewhere, some of the folks that</p> <p>13 have been there for a long time.</p> <p>14 So I know Rhonda Brasher was on your</p> <p>15 team. Did you ever talk to Rhonda about whether</p> <p>16 she wanted to move up?</p> <p>17 <b>A. She never -- she's an account exec,</b></p> <p>18 <b>and that's what she will be, and she's been there</b></p> <p>19 <b>almost as long as I have, and that's her job.</b></p> <p>20 <b>She's still there.</b></p> <p>21 Q. What about Cathryn Reeves?</p> <p>22 <b>A. Cathy Reeves had her job, and she was</b></p> <p>23 <b>happy with her job, and she never had any</b></p>
<p>Page 54</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. No, because I know a lot of agents</b></p> <p>3 <b>didn't like what the men had to say to them</b></p> <p>4 <b>either. So I think that -- it's business.</b></p> <p>5 Q. Right. But they still did business</p> <p>6 with them, right?</p> <p>7 <b>A. Yeah.</b></p> <p>8 Q. Can you think of any gender</p> <p>9 stereotypes that you're familiar with?</p> <p>10 MS. BARLOTTA: Object to form.</p> <p>11 <b>A. I don't know what you're asking.</b></p> <p>12 Q. Did you ever hear anything at CRC</p> <p>13 about women not wanting to travel?</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 <b>A. I -- that's a choice. I mean, my</b></p> <p>16 <b>job, what I did, I had to travel every other week</b></p> <p>17 <b>at least two or three days a week. That was my</b></p> <p>18 <b>choice.</b></p> <p>19 Q. Did you ever hear any of the other</p> <p>20 brokers make any comments about some of their</p> <p>21 staff not wanting to travel?</p> <p>22 <b>A. No, not really.</b></p> <p>23 Q. Did you ever have any conversations</p>	<p>Page 56</p> <p>1 <b>interest in -- I mean, she was an inside broker.</b></p> <p>2 <b>She came to us as an inside broker.</b></p> <p>3 Q. Okay. Did you ask Cathy if she was</p> <p>4 happy in her job?</p> <p>5 <b>A. I -- no. I mean, she was there for</b></p> <p>6 <b>many years and did it and liked it. I mean, she</b></p> <p>7 <b>would have left if she didn't.</b></p> <p>8 Q. Yeah. Did you ever ask her if she</p> <p>9 wanted to be a broker?</p> <p>10 <b>A. No. But I --</b></p> <p>11 Q. What about Yvette Talsma, did you</p> <p>12 ever have a conversation with her about</p> <p>13 advancement?</p> <p>14 <b>A. No.</b></p> <p>15 Q. Andrea Sutton?</p> <p>16 <b>A. No.</b></p> <p>17 Q. What about Lauren Lindberg?</p> <p>18 <b>A. No.</b></p> <p>19 Q. You said she was on --</p> <p>20 <b>A. She was on our team.</b></p> <p>21 Q. On your team. Did you ever talk to</p> <p>22 her about advancement?</p> <p>23 <b>A. Not really.</b></p>



<p style="text-align: right;">Page 57</p> <p>1 Q. You said not really.</p> <p>2 <b>A. Because she worked for Lee, okay? It</b></p> <p>3 <b>was Susan, Lee, Lauren.</b></p> <p>4 Q. Okay. Did you ever ask her if she</p> <p>5 wanted to be more than Lee's --</p> <p>6 <b>A. No.</b></p> <p>7 Q. Why not?</p> <p>8 <b>A. I guess if she had said something to</b></p> <p>9 <b>me, that would have been different, but she was</b></p> <p>10 <b>doing her job, and she wasn't really with us all</b></p> <p>11 <b>that long. She came to us from property and was</b></p> <p>12 <b>there a couple of years. And, again, I was</b></p> <p>13 <b>working remote, so I wasn't sitting around</b></p> <p>14 <b>talking to people.</b></p> <p>15 Q. Right, you weren't with them.</p> <p>16 <b>A. Yeah.</b></p> <p>17 Q. That makes sense. If Lauren had</p> <p>18 expressed an interest in advancement but there</p> <p>19 wasn't a spot on your team, would she have been</p> <p>20 able to move to another team?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. I guess she could if she wanted to.</b></p> <p>23 Q. Is that something that's allowed at</p>	<p style="text-align: right;">Page 59</p> <p>1 that training.</p> <p>2 <b>A. It was probably when like BB&amp;T bought</b></p> <p>3 <b>us in 2000, you know, and they do a managers</b></p> <p>4 <b>something for all the team leaders, but it was</b></p> <p>5 <b>not that -- it wasn't anything that stands out.</b></p> <p>6 Q. Was that just a one-time training</p> <p>7 that you recall?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. And do you recall whether that</p> <p>10 training involved how to handle complaints of</p> <p>11 discrimination?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. I don't remember that being covered</b></p> <p>14 <b>in that specific, but that is something that's</b></p> <p>15 <b>covered every year when they do their annual --</b></p> <p>16 <b>you've got to do your annual online training, and</b></p> <p>17 <b>they refer you to, you know, 1-800, policies and</b></p> <p>18 <b>procedures on the website and where to go to get</b></p> <p>19 <b>help.</b></p> <p>20 Q. Okay. As a manager of your team,</p> <p>21 what did you understand your duty to be with</p> <p>22 regard to complaints of discrimination?</p> <p>23 <b>A. Well, it would have been to report</b></p>
<p style="text-align: right;">Page 58</p> <p>1 CRC?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 <b>A. Uh-huh (positive response). Everyone</b></p> <p>4 <b>has to agree.</b></p> <p>5 Q. Who is everyone?</p> <p>6 <b>A. Whoever team you're on, letting them</b></p> <p>7 <b>go, and the team they're going to wanting to take</b></p> <p>8 <b>them, has a place for them.</b></p> <p>9 Q. Okay. So if a -- if someone's team</p> <p>10 they didn't want to let them go, they wouldn't be</p> <p>11 able to move?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. I don't know.</b></p> <p>14 Q. Is that kind of like a staffing, we</p> <p>15 need somebody in the spot type of situation?</p> <p>16 <b>A. Yeah. Yeah.</b></p> <p>17 Q. Were you considered a manager?</p> <p>18 <b>A. Of my team.</b></p> <p>19 Q. Okay. Did you go through specific</p> <p>20 manager training?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. Yes, many years ago.</b></p> <p>23 Q. Okay. Tell me, if you can, about</p>	<p style="text-align: right;">Page 60</p> <p>1 <b>them -- if somebody had complained about</b></p> <p>2 <b>discrimination on my team, I would have contacted</b></p> <p>3 <b>HR, Truist, or BB&amp;T and said, you know, We have</b></p> <p>4 <b>an issue and, you know, how do I handle it.</b></p> <p>5 Q. What if somebody told you about</p> <p>6 discrimination on another team? What would your</p> <p>7 duty be then?</p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 <b>A. I think it's the same. You go to HR,</b></p> <p>10 <b>1-800, or Stefani Petty or whoever and say, you</b></p> <p>11 <b>know, A person complained to me, and I would pass</b></p> <p>12 <b>it up to the next level.</b></p> <p>13 Q. Okay. And we've heard a lot about</p> <p>14 Stefani Petty in our depositions. Who is Stefani</p> <p>15 Petty to you?</p> <p>16 <b>A. She was the -- she was my contact for</b></p> <p>17 <b>HR at Truist.</b></p> <p>18 Q. Okay. And did you have any occasion</p> <p>19 to speak with Stefani Petty about any complaints</p> <p>20 of discrimination?</p> <p>21 <b>A. No.</b></p> <p>22 Q. Did Stefani Petty ever reach out to</p> <p>23 you specifically about Kathryn Hendrix's</p>

<p style="text-align: right;">Page 61</p> <p>1 complaints?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Are you familiar with Christy Smith?</p> <p>4 <b>A. Yeah.</b></p> <p>5 Q. Do you recall what position or what</p> <p>6 team Christy Smith worked on?</p> <p>7 <b>A. I think she was on our underwriting</b></p> <p>8 <b>team.</b></p> <p>9 Q. Okay. Do you know a rough time</p> <p>10 period of when she would have been on that team?</p> <p>11 <b>A. No.</b></p> <p>12 Q. Do you remember having any specific</p> <p>13 conversations with Christy Smith about her</p> <p>14 employment?</p> <p>15 <b>A. Huh-uh (negative response), no.</b></p> <p>16 Q. What about Karissa Cooley? Do you</p> <p>17 know Karissa Cooley?</p> <p>18 <b>A. Yeah.</b></p> <p>19 Q. Okay. Who is Karissa Cooley?</p> <p>20 <b>A. She was on Rusty's team.</b></p> <p>21 Q. What was her position on Rusty's</p> <p>22 team? Do you know?</p> <p>23 <b>A. Account exec.</b></p>	<p style="text-align: right;">Page 63</p> <p>1 know Sarah Dunston?</p> <p>2 <b>A. Is that her name now?</b></p> <p>3 Q. That's the name I understand.</p> <p>4 <b>A. I'm going to say no.</b></p> <p>5 Q. Okay. She was on James Powell's</p> <p>6 team. Does that ring any bells?</p> <p>7 <b>A. It's been a long time ago, okay?</b></p> <p>8 Q. I understand. I understand.</p> <p>9 <b>A. I'm glad you remember, but no.</b></p> <p>10 Q. I often joke that I don't remember</p> <p>11 what I had for breakfast.</p> <p>12 <b>A. I don't remember what I wore</b></p> <p>13 <b>yesterday.</b></p> <p>14 Q. And then we've already talked about</p> <p>15 Lauren Lindberg. Do you know why Lauren left the</p> <p>16 property department?</p> <p>17 <b>A. She was unhappy with the team she was</b></p> <p>18 <b>on.</b></p> <p>19 Q. Do you have any information about</p> <p>20 what she was unhappy about?</p> <p>21 <b>A. Well, she worked for Mason, and he</b></p> <p>22 <b>said something or did something. I don't know.</b></p> <p>23 Q. Okay.</p>
<p style="text-align: right;">Page 62</p> <p>1 Q. Do you know how long she worked with</p> <p>2 Rusty as an account exec?</p> <p>3 <b>A. No.</b></p> <p>4 Q. Did you have any conversations with</p> <p>5 Karissa Cooley about her employment with CRC?</p> <p>6 <b>A. No.</b></p> <p>7 Q. Do you remember when Karissa Cooley</p> <p>8 left CRC?</p> <p>9 <b>A. She didn't. She's still there.</b></p> <p>10 Q. She's still employed there?</p> <p>11 <b>A. As far as I know. She's in our IT</b></p> <p>12 <b>department.</b></p> <p>13 Q. Okay. So she moved departments?</p> <p>14 <b>A. Yes. She liked IT.</b></p> <p>15 Q. Did she move to IT within CRC or</p> <p>16 Truist?</p> <p>17 <b>A. Oh, I don't know how -- I know she's</b></p> <p>18 <b>our contact when I want to take a computer out of</b></p> <p>19 <b>the country. That's who I talk to.</b></p> <p>20 Q. Understood. Understood. Those tech</p> <p>21 people are super important.</p> <p>22 <b>A. Uh-huh (positive response).</b></p> <p>23 Q. What about Sarah Dunston? Do you</p>	<p style="text-align: right;">Page 64</p> <p>1 <b>A. But she wanted to go to another team,</b></p> <p>2 <b>and we needed help. Again, there we go. We</b></p> <p>3 <b>weren't looking for anybody, but they wanted to</b></p> <p>4 <b>find her another place, and she wanted to come to</b></p> <p>5 <b>professional.</b></p> <p>6 <b>So she came down. And Lee needed</b></p> <p>7 <b>help, and he had built up his book enough that he</b></p> <p>8 <b>could afford to have help.</b></p> <p>9 Q. Okay. Do you recall who moved her to</p> <p>10 the property department, like who -- I'm sorry --</p> <p>11 from the property department, like who made the</p> <p>12 decision to approach you?</p> <p>13 <b>A. John Cadden is the one that came to</b></p> <p>14 <b>-- I'm sure Rusty first and then to me.</b></p> <p>15 Q. Okay.</p> <p>16 <b>A. Because Cadden was in the -- is in</b></p> <p>17 <b>the property department.</b></p> <p>18 Q. Okay.</p> <p>19 <b>A. In addition to being office</b></p> <p>20 <b>president, he's also a property broker.</b></p> <p>21 Q. Okay. And as you understood it, she</p> <p>22 had a complaint about her supervisor?</p> <p>23 MS. BARLOTTA: Object to form.</p>

<p style="text-align: right;">Page 65</p> <p>1 <b>A. Yeah, yeah.</b></p> <p>2 Q. Do you remember the content or the</p> <p>3 subject of that complaint?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. No, I -- no. I know she wanted to</b></p> <p>6 <b>move.</b></p> <p>7 Q. Talk to me about Rusty Hughes. Rusty</p> <p>8 is the head of the professional department,</p> <p>9 right?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. And at one point, he worked under</p> <p>12 you?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Under Betsy?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Okay. And so when Betsy retired, did</p> <p>17 Rusty just automatically get that head of the</p> <p>18 department spot?</p> <p>19 MS. BARLOTTA: Object to form.</p> <p>20 <b>A. Betsy talked to both Dave and myself,</b></p> <p>21 <b>and we both agreed that Rusty would be a good</b></p> <p>22 <b>candidate to take over the job.</b></p> <p>23 Q. And as head of the department, would</p>	<p style="text-align: right;">Page 67</p> <p>1 <b>A. No.</b></p> <p>2 Q. Is that because he's in a different</p> <p>3 department?</p> <p>4 <b>A. On a different floor, different</b></p> <p>5 <b>department, and yeah. I mean, we both -- he had</b></p> <p>6 <b>been there like a year or two longer than me. So</b></p> <p>7 <b>we both had been there, but no, we just didn't</b></p> <p>8 <b>sit around and talk.</b></p> <p>9 Q. And John is the president of CRC?</p> <p>10 <b>A. Of the office in Birmingham.</b></p> <p>11 Q. Okay. And so would Rusty report to</p> <p>12 John?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Would Betsy have reported to John</p> <p>15 when she was the head of the department?</p> <p>16 <b>A. I don't think they made him office</b></p> <p>17 <b>president until -- there wasn't an office</b></p> <p>18 <b>president, I don't think, until she had left.</b></p> <p>19 Q. Okay. Do you recall whether you had</p> <p>20 a lunch with Betsy and all the other brokers at</p> <p>21 Gianmarco's after she left CRC?</p> <p>22 MS. BARLOTTA: Object to form.</p> <p>23 Q. Like just a broker lunch at --</p>
<p style="text-align: right;">Page 66</p> <p>1 one of Rusty's duties be to handle complaints of</p> <p>2 discrimination within the department?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Did you ever make any statements to</p> <p>6 Rusty about the number of female brokers at CRC?</p> <p>7 <b>A. No.</b></p> <p>8 Q. Did you ever make any statements to</p> <p>9 Rusty about the number of female account</p> <p>10 executives at CRC?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. No.</b></p> <p>13 Q. Do you have any information about</p> <p>14 whether anyone else made any statements to Rusty</p> <p>15 about the number of female brokers at CRC?</p> <p>16 MS. BARLOTTA: Object to form.</p> <p>17 <b>A. I don't know.</b></p> <p>18 Q. You never heard any of that type of</p> <p>19 talk?</p> <p>20 <b>A. No.</b></p> <p>21 Q. Did you have dealings with John</p> <p>22 Cadden on, let's say, like a weekly basis before</p> <p>23 you went remote?</p>	<p style="text-align: right;">Page 68</p> <p>1 specifically at Gianmarco's?</p> <p>2 <b>A. I don't remember.</b></p> <p>3 Q. Okay. Would that have been unusual?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. No.</b></p> <p>6 Q. Do you have any recollection of Betsy</p> <p>7 making any statement to the other brokers that</p> <p>8 she was disappointed that females -- disappointed</p> <p>9 at how females were being treated in the</p> <p>10 department?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. I don't remember.</b></p> <p>13 Q. Are you saying it didn't happen or</p> <p>14 you just don't remember?</p> <p>15 <b>A. I don't remember.</b></p> <p>16 MS. BARLOTTA: Object to form.</p> <p>17 <b>A. I'm not saying it didn't happen.</b></p> <p>18 <b>That sounds very much like her to say, I'm very</b></p> <p>19 <b>disappointed with something. So I'm not going to</b></p> <p>20 <b>say it didn't happen. I just don't remember.</b></p> <p>21 Q. I understand that, and I also</p> <p>22 understand that Betsy recently passed. I'm</p> <p>23 sorry.</p>

<p style="text-align: right;">Page 69</p> <p>1 <b>A. Yeah, two weeks ago.</b></p> <p>2 Q. I know you must have been very close.</p> <p>3 <b>A. We lived about a couple of miles from</b></p> <p>4 <b>each other.</b></p> <p>5 Q. Oh, gosh. I hope you got to spend</p> <p>6 some time with her.</p> <p>7 <b>A. Yeah, a couple of times.</b></p> <p>8 Q. So you're not denying that she made</p> <p>9 that statement. You just don't have any specific</p> <p>10 knowledge?</p> <p>11 <b>A. I just don't remember any specifics</b></p> <p>12 <b>to say yes, I remember that.</b></p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 Q. Do you recall any of the other</p> <p>15 brokers talking about anything like that?</p> <p>16 MS. BARLOTTA: Object to form.</p> <p>17 Q. Talking about anything regarding</p> <p>18 Betsy being disappointed in the department's</p> <p>19 treatment of women?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. No.</b></p> <p>22 Q. Okay.</p> <p>23 <b>A. There wasn't a lot of people to talk</b></p>	<p style="text-align: right;">Page 71</p> <p>1 Q. Where did that come from?</p> <p>2 <b>A. Truist.</b></p> <p>3 Q. Okay. Is that like a service award?</p> <p>4 <b>A. (Witness nods head.)</b></p> <p>5 Q. Yeah?</p> <p>6 <b>A. Yeah.</b></p> <p>7 Q. Was that for your retirement?</p> <p>8 <b>A. Yeah.</b></p> <p>9 Q. Okay. What about before that? Did</p> <p>10 CRC ever do anything to recognize your</p> <p>11 accomplishments?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. They would hold, and I assume they</b></p> <p>14 <b>still do, million dollar producer events, that if</b></p> <p>15 <b>you produce a million dollars, you know, you went</b></p> <p>16 <b>to -- the group as a whole would go to California</b></p> <p>17 <b>or Florida, and they treated you very nice.</b></p> <p>18 Q. Okay. How many of those did you get</p> <p>19 to go to?</p> <p>20 <b>A. I don't know. Ten, twelve maybe.</b></p> <p>21 Q. Do you recall who from Birmingham</p> <p>22 would have gotten to go to those with you?</p> <p>23 <b>A. Anybody that was a million dollar</b></p>
<p style="text-align: right;">Page 70</p> <p>1 <b>to, you know, so -- and again, I wasn't there.</b></p> <p>2 Q. You say that, but I look at this</p> <p>3 list, and I get everybody all mixed up. I don't</p> <p>4 know who all those people are. I have me,</p> <p>5 myself, and I. That is it.</p> <p>6 <b>A. And you mentioned the ones I know.</b></p> <p>7 <b>There's -- I bet I don't know half the people in</b></p> <p>8 <b>the department now.</b></p> <p>9 Q. Because it's grown that much?</p> <p>10 <b>A. Uh-huh (positive response).</b></p> <p>11 Q. Do you think CRC is a successful</p> <p>12 business?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 <b>A. Very.</b></p> <p>15 Q. And you had a big part in that,</p> <p>16 didn't you?</p> <p>17 <b>A. I like to think so.</b></p> <p>18 Q. Did you get any accolades or awards?</p> <p>19 MS. BARLOTTA: Object to form.</p> <p>20 <b>A. Talking about the crystal tower</b></p> <p>21 <b>office about this big (indicating)?</b></p> <p>22 Q. Yeah, of course.</p> <p>23 <b>A. I got one.</b></p>	<p style="text-align: right;">Page 72</p> <p>1 <b>producer was invited.</b></p> <p>2 Q. Yeah. Does anybody stand out to you</p> <p>3 as this person always seemed to be there with me?</p> <p>4 <b>A. Well, there was -- yeah, it's usually</b></p> <p>5 <b>the same group, you know.</b></p> <p>6 Q. Rusty Hughes?</p> <p>7 <b>A. Rusty, Corey, James, Betsy. Dave</b></p> <p>8 <b>didn't go. From our department, that would have</b></p> <p>9 <b>been probably it.</b></p> <p>10 Q. Okay. And that's because you met a</p> <p>11 certain level of revenue?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Do you remember taking a trip to</p> <p>14 Colorado in 2018 with CRC?</p> <p>15 <b>A. Uh-huh (positive response), yes.</b></p> <p>16 Q. What was the purpose of that trip?</p> <p>17 <b>A. It was a professional meeting to</b></p> <p>18 <b>discuss markets.</b></p> <p>19 Q. Okay. And so that would have been --</p> <p>20 was it like all -- like a bunch of employees from</p> <p>21 CRC nationwide or was it open to other companies</p> <p>22 as well?</p> <p>23 <b>A. It was CRC, professional. There was</b></p>

<p style="text-align: right;">Page 73</p> <p>1 usually a day of medical and a day of</p> <p>2 non-medical.</p> <p>3 Q. Okay. Did you come home right after</p> <p>4 the meetings?</p> <p>5 A. No. A group of us went up to</p> <p>6 Colorado Springs.</p> <p>7 Q. Who was in that group?</p> <p>8 A. Kathryn, myself, Lauren, and Cathy</p> <p>9 Reeves.</p> <p>10 Q. Tell me how that trip to Colorado</p> <p>11 Springs came about. Whose idea was it?</p> <p>12 A. Probably mine.</p> <p>13 Q. Okay. Do you know how you</p> <p>14 communicated to them that you wanted to take this</p> <p>15 trip?</p> <p>16 A. An e-mail.</p> <p>17 Q. Okay. Would that have been -- if so,</p> <p>18 would that have been on your CRC e-mail?</p> <p>19 A. Oh, yeah.</p> <p>20 Q. Did you invite anybody other than</p> <p>21 Kathryn, Cathy, and Lauren?</p> <p>22 A. No. It was just four. We all knew</p> <p>23 each other, and so -- and I hadn't been there, or</p>	<p style="text-align: right;">Page 75</p> <p>1 and Lauren Lindberg.</p> <p>2 Does this Exhibit 40 appear to be the</p> <p>3 group text between you, Cathy Reeves, Lauren</p> <p>4 Lindberg, and Kathy Hendrix while you guys were</p> <p>5 in Colorado?</p> <p>6 A. It sounds like we're heading down to</p> <p>7 get breakfast before the meeting or something.</p> <p>8 Q. Okay. Flip for me to page -- on the</p> <p>9 bottom, it says Hendrix000498. What's that</p> <p>10 picture right there?</p> <p>11 A. Oh, that's me at the game.</p> <p>12 Q. Is that like a -- that's baseball,</p> <p>13 right?</p> <p>14 A. Baseball.</p> <p>15 Q. Whose baseball, the Rockies?</p> <p>16 A. Colorado Rockies.</p> <p>17 Q. I saw the Cubs in Chicago, and that</p> <p>18 was an experience there.</p> <p>19 The next page, the bottom of Page</p> <p>20 499, Lauren Lindberg sends a link, and it looks</p> <p>21 like to an Enneagram test. Do you remember</p> <p>22 taking an Enneagram Personality Test?</p> <p>23 A. I don't know what that is.</p>
<p style="text-align: right;">Page 74</p> <p>1 I hadn't been there since I was a kid, so I</p> <p>2 wanted to go, so I wanted someone to go with me.</p> <p>3 Q. I understand you guys had a good</p> <p>4 time.</p> <p>5 A. We did.</p> <p>6 Q. Is that what you recall?</p> <p>7 A. Yes. Snowing up on Pikes Peak in the</p> <p>8 middle of summer.</p> <p>9 Q. Did you go skiing?</p> <p>10 A. No, but I had shorts on.</p> <p>11 Q. Were you freezing?</p> <p>12 A. Yes.</p> <p>13 Q. I think I've seen some pictures of</p> <p>14 you wrapped in a blanket, so that makes sense.</p> <p>15 All right. I'm going to show you</p> <p>16 Plaintiff's Exhibit 40.</p> <p>17 (Whereupon, Plaintiff's Exhibit No.</p> <p>18 40 was marked for identification and a copy of</p> <p>19 same is attached hereto.)</p> <p>20 Q. And this is a string of text</p> <p>21 messages, and it's got the bubbles back and</p> <p>22 forth. And if you'll look up at the top, it</p> <p>23 says, Messages, Cathy Reeves and Susan Phillips</p>	<p style="text-align: right;">Page 76</p> <p>1 Q. So you don't remember you guys</p> <p>2 talking about personality tests and what type of</p> <p>3 personality people have?</p> <p>4 A. No. I don't know what that is.</p> <p>5 Q. Okay. And then the next page, Page</p> <p>6 500, towards the bottom there's a text from you:</p> <p>7 As soon as everyone ready, if okay we'll drive</p> <p>8 straight to Pikes Peak. Let's shoot for 8:15,</p> <p>9 8:30.</p> <p>10 A. Uh-huh (positive response).</p> <p>11 Q. That looks like it was on July 12th,</p> <p>12 2018. So is that the day that you guys drove up</p> <p>13 to Pikes Peak?</p> <p>14 A. Well, that's what it says here, so I</p> <p>15 would go with what it says here.</p> <p>16 Q. Okay. How long did you stay at Pikes</p> <p>17 Peak?</p> <p>18 A. Just that Friday to Sunday or Friday</p> <p>19 to Monday. Just -- I don't even remember, maybe</p> <p>20 it was Thursday. What day is the 12th?</p> <p>21 Q. Oh, I have no idea, but just a couple</p> <p>22 of days?</p> <p>23 A. It was like two nights.</p>

<p style="text-align: right;">Page 77</p> <p>1 Q. Okay. Did y'all stay at a hotel?</p> <p>2 <b>A. It was like a cabin thing.</b></p> <p>3 Q. Okay. Was it like a cabin where you</p> <p>4 guys were all in the cabin together with</p> <p>5 different rooms?</p> <p>6 <b>A. I think there was two rooms.</b></p> <p>7 Q. Okay. Who shared rooms?</p> <p>8 <b>A. Lauren and Kathryn shared, and Cathy</b></p> <p>9 <b>and I shared.</b></p> <p>10 Q. Okay. What do you recall</p> <p>11 specifically about that trip to Pikes Peak other</p> <p>12 than it snowing?</p> <p>13 <b>A. We had a good time. It was snowing.</b></p> <p>14 <b>We did a -- I think we did a rafting trip. We --</b></p> <p>15 <b>yeah, took a boat -- a train ride.</b></p> <p>16 Q. Okay. And did you have a</p> <p>17 conversation with Kat during that trip about Dave</p> <p>18 Sloneker requesting her as a broker at some</p> <p>19 point?</p> <p>20 <b>A. I don't remember that.</b></p> <p>21 Q. Okay. Are you saying it didn't</p> <p>22 happen or you just don't remember?</p> <p>23 <b>A. I don't remember, no.</b></p>	<p style="text-align: right;">Page 79</p> <p>1 happen. You just don't remember?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 <b>A. I'm not saying, yeah, it didn't</b></p> <p>4 <b>happen. I know there was a space available and</b></p> <p>5 <b>that she may have been interested, but I don't</b></p> <p>6 <b>know how the -- how it went after that.</b></p> <p>7 Q. Yeah. How do you know that she may</p> <p>8 have been interested?</p> <p>9 <b>A. She told me.</b></p> <p>10 Q. Okay. When did she tell you that?</p> <p>11 <b>A. I don't know.</b></p> <p>12 Q. Do you remember like anything about</p> <p>13 that conversation?</p> <p>14 <b>A. No, just that she was interested in</b></p> <p>15 <b>moving into a broker position, and I said, You</b></p> <p>16 <b>need to talk to Corey and Rusty and talk it out.</b></p> <p>17 Q. Okay. And if she was interested in</p> <p>18 moving to a broker position, she -- with manager</p> <p>19 approval, she could have done that outside of</p> <p>20 Corey's team, right?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. I guess.</b></p> <p>23 Q. Do you recall on your Colorado trip</p>
<p style="text-align: right;">Page 78</p> <p>1 Q. Do you remember Dave Sloneker</p> <p>2 requesting Kat at some point?</p> <p>3 <b>A. No.</b></p> <p>4 Q. Did you have a conversation with Kat</p> <p>5 during that trip about you requesting Kat as a</p> <p>6 broker at some point?</p> <p>7 <b>A. No.</b></p> <p>8 Q. Are you saying it didn't happen or</p> <p>9 you --</p> <p>10 <b>A. That didn't happen, because I didn't</b></p> <p>11 <b>have any -- any places on my team. I could not</b></p> <p>12 <b>have anyone else on my team.</b></p> <p>13 Q. Okay. So if Dave wanted someone for</p> <p>14 his team that was already employed at CRC, would</p> <p>15 he have to talk to Rusty and John about it?</p> <p>16 MS. BARLOTTA: Object to form.</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. And you don't remember talking to Kat</p> <p>19 about Dave going to Rusty and John and them not</p> <p>20 letting it happen?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. Yeah, I don't remember that.</b></p> <p>23 Q. But you're not saying it didn't</p>	<p style="text-align: right;">Page 80</p> <p>1 talking to Kat about the noncompetes that CRC had</p> <p>2 her sign?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. No.</b></p> <p>5 Q. Do you recall her saying that her</p> <p>6 lawyer never charged her to look at the</p> <p>7 noncompetes?</p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 <b>A. No.</b></p> <p>10 Q. Do you recall telling her that it was</p> <p>11 probably because he knew he would see her again</p> <p>12 at some point?</p> <p>13 <b>A. See her again?</b></p> <p>14 Q. That the lawyer would likely see her</p> <p>15 again?</p> <p>16 MS. BARLOTTA: Object to form.</p> <p>17 <b>A. No.</b></p> <p>18 Q. Okay. Are you saying it didn't</p> <p>19 happen or you just don't remember?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Yeah, I don't remember that</b></p> <p>22 <b>conversation.</b></p> <p>23 Q. Okay. Do you recall saying anything</p>



<p>Page 81</p> <p>1 about that the lawyer may see the rest of us, me, 2 Betsy, Leann, Kathy? Does that sound familiar at 3 all? 4 <b>A. I don't even know what we're talking</b> 5 <b>about.</b> 6 Q. So you don't recall talking to Kat at 7 all about that the women at CRC may have a reason 8 they need to speak to a lawyer? 9 MS. BARLOTTA: Object to form. 10 <b>A. No.</b> 11 Q. Okay. Do you remember anybody ever 12 talking to you about overtime at CRC? 13 MS. BARLOTTA: Object to form. 14 <b>A. What do you mean?</b> 15 Q. Do you recall having a conversation 16 with any account executive about them being told 17 to just put 8:00 to 5:00 in their time regardless 18 of what they worked? 19 MS. BARLOTTA: Object to form. 20 <b>A. I'm going to say I'm a little</b> 21 <b>confused, because most of the account exec</b> 22 <b>positions were nonexempt. So you couldn't have</b> 23 <b>overtime.</b></p>	<p>Page 83</p> <p>1 MS. BARLOTTA: Object to form. 2 <b>A. Was that a group or was that just us?</b> 3 <b>I don't know. I don't remember.</b> 4 Q. It would have been a group. 5 <b>A. Oh, yeah, probably. I do remember</b> 6 <b>going there once.</b> 7 Q. Okay. Did -- would you have any 8 reason to dispute if Kat said that that lunch was 9 when she talked to you about her desires to move 10 up into a broker role? 11 MS. BARLOTTA: Object to form. 12 <b>A. I would have no reason to dispute</b> 13 <b>that.</b> 14 Q. I love Slice Pizza, by the way. 15 <b>A. I've only been there that one time, I</b> 16 <b>think. That's why I had to ask.</b> 17 Q. You have to go back and get the 18 wings. I like the wings more than the pizza. 19 We have been going right about just 20 over an hour. Let's take a quick break and let 21 me chat with my folks here, and then we -- 22 hopefully, we'll wrap you up real quick. 23 <b>A. That's only an hour?</b></p>
<p>Page 82</p> <p>1 Q. Okay. 2 <b>A. Or is it exempt? Exempt, which --</b> 3 Q. You were right, it's nonexempt, 4 right. 5 <b>A. Nonexempt, and the account exec</b> 6 <b>positions at one time were -- you could not get</b> 7 <b>overtime. Now, I think sometime over the years,</b> 8 <b>they may have changed that status to where they</b> 9 <b>could get overtime. But it was not -- on my</b> 10 <b>team, it was just not an issue.</b> 11 Q. Okay. 12 <b>A. I don't remember talking to anybody</b> 13 <b>about it.</b> 14 Q. Did you have to sign off on your 15 employees' time? 16 MS. BARLOTTA: Object to form. 17 <b>A. I don't know, because I did not -- my</b> 18 <b>team did not have overtime.</b> 19 Q. Okay. Did you ever go to lunch with 20 Kat? 21 <b>A. I think we went once or twice, yes.</b> 22 Q. Do you remember going to lunch at 23 Slice Pizza?</p>	<p>Page 84</p> <p>1 Q. It's only an hour. It feels like 2 forever, doesn't it? 3 If you get up, just take your mic off 4 so that you don't walk away with it, and then 5 they'll have to read us off the record. 6 VIDEOGRAPHER: All right. We are off 7 the record at 3:16 p.m. 8 (Whereupon, a brief recess was 9 taken.) 10 VIDEOGRAPHER: We are back on the 11 record at 3:24 p.m. 12 Q. (BY MS. PALMER:) All right, Susan. 13 So we took a quick break. Is there anything 14 about your testimony you want to change? 15 <b>A. I've been to Slice twice, not once.</b> 16 Q. That is an important distinction. 17 <b>A. That's right.</b> 18 Q. Because you brought that up, I want 19 to talk specifically about that. Kat says that 20 the two of you stepped outside at Slice when you 21 were with the group and smoked a cigarette. Do 22 you smoke? 23 <b>A. I did. Quit 2018.</b></p>

<p style="text-align: right;">Page 85</p> <p>1 Q. Congratulations. My dad quit cold</p> <p>2 turkey last year, and I could not believe it. It</p> <p>3 is hard.</p> <p>4 <b>A. I pretty much did, too; but if they</b></p> <p>5 <b>ever tell me I have lung cancer, I'll be buying</b></p> <p>6 <b>me a carton and heading to the Middle East.</b></p> <p>7 Q. I think he said the same thing.</p> <p>8 So she says that the two of you</p> <p>9 stepped outside to have a cigarette and had a</p> <p>10 discussion, and during that discussion you said,</p> <p>11 I asked for you, and that that would have been</p> <p>12 just before your team hired Lauren Lindberg.</p> <p>13 Does that ring any bells at all?</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 <b>A. No, because I don't remember asking</b></p> <p>16 <b>for Lauren.</b></p> <p>17 Q. Okay. But you had a need on your</p> <p>18 team --</p> <p>19 <b>A. Maybe I asked on behalf of her, but I</b></p> <p>20 <b>cannot say -- like for Dave maybe I asked on</b></p> <p>21 <b>behalf or I asked, but I don't remember, because</b></p> <p>22 <b>my team, it only would have been to be Lee's</b></p> <p>23 <b>assistant would have been all we would have had</b></p>	<p style="text-align: right;">Page 87</p> <p>1 <b>not a short period of time, several years,</b></p> <p>2 <b>because she helped start the healthcare portion</b></p> <p>3 <b>of it. I do think she's the only other female</b></p> <p>4 <b>broker we had in our department.</b></p> <p>5 Q. Okay. How many brokers do you think</p> <p>6 were there in 2019?</p> <p>7 <b>A. Oh, I don't know.</b></p> <p>8 Q. More or less than twenty?</p> <p>9 <b>A. What are you calling broker, named</b></p> <p>10 <b>brokers or just anybody they call inside,</b></p> <p>11 <b>outside, associate? I don't know.</b></p> <p>12 Q. You tell me. Who's a broker?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 <b>A. Well, we went through and listed them</b></p> <p>15 <b>earlier. It was --</b></p> <p>16 Q. Well, those were the team leads,</p> <p>17 right?</p> <p>18 <b>A. Yeah, team leaders.</b></p> <p>19 Q. But under those team leaders could</p> <p>20 have been other revenue-producing brokers, right?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. I don't know how the other teams</b></p> <p>23 <b>operated. I had Lee on my team, and he was a</b></p>
<p style="text-align: right;">Page 86</p> <p>1 <b>on my team.</b></p> <p>2 Q. Okay. And would it have been</p> <p>3 possible for Lee's assistant to eventually move</p> <p>4 up in the ranks?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. I don't know.</b></p> <p>7 Q. Is that a path that some account</p> <p>8 executives take?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. I don't know.</b></p> <p>11 Q. You were with CRC for, what did you</p> <p>12 say, thirty --</p> <p>13 <b>A. Two.</b></p> <p>14 Q. Thirty-two years. And in that time,</p> <p>15 you and Betsy were the only women in professional</p> <p>16 liability, right?</p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 Q. I'm sorry. The only female brokers</p> <p>19 in professional liability?</p> <p>20 <b>A. That's not true.</b></p> <p>21 Q. Okay. Who else would have been in</p> <p>22 professional liability?</p> <p>23 <b>A. Leann Sherer was there for a short --</b></p>	<p style="text-align: right;">Page 88</p> <p>1 <b>revenue producer.</b></p> <p>2 Q. Okay. Do you have any estimate of</p> <p>3 the number of revenue-producing brokers in the</p> <p>4 professional liability department around 2019?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. No.</b></p> <p>7 Q. Do you think it would be more or less</p> <p>8 than twenty?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. I don't know, because I don't know</b></p> <p>11 <b>who was on -- I don't know the titles of all the</b></p> <p>12 <b>people on the other teams.</b></p> <p>13 Q. Okay. So I have here a list.</p> <p>14 <b>A. If I had a list, maybe I could look.</b></p> <p>15 Q. And it's -- this one is all marked</p> <p>16 up.</p> <p>17 MS. PALMER: Cynthia, do we have</p> <p>18 another list? Or maybe we can just count them</p> <p>19 out.</p> <p>20 Q. (BY MS. PALMER:) Daniel O'Connor,</p> <p>21 Tyler O'Connor?</p> <p>22 <b>A. That's Tyler.</b></p> <p>23 Q. Is he a broker?</p>



<p style="text-align: right;">Page 89</p> <p>1 <b>A. Yes.</b></p> <p>2 Q. Okay. Dave Sloneker?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Clay Segrest?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Cathy Cochran?</p> <p>7 <b>A. I don't know who that is.</b></p> <p>8 Q. Rhonda Brasher was not. Kathryn</p> <p>9 Hendrix, Brandi Russell, Vandalyn Green, Maria</p> <p>10 Powe.</p> <p>11 MS. WILKINSON: Leslie, hold on one</p> <p>12 second. Did you bring the exhibits?</p> <p>13 THE REPORTER: Yes.</p> <p>14 MS. WILKINSON: Are they on the</p> <p>15 table?</p> <p>16 THE REPORTER: Uh-huh (affirmative</p> <p>17 response.)</p> <p>18 MS. WILKINSON: It's Number 27 on the</p> <p>19 table. That may help.</p> <p>20 MS. PALMER: It will.</p> <p>21 <b>A. There you go.</b></p> <p>22 Q. (BY MS. PALMER:) Let me show you</p> <p>23 Plaintiff's Exhibit 27. Look for me through that</p>	<p style="text-align: right;">Page 91</p> <p>1 <b>A. I don't know.</b></p> <p>2 Q. You don't know? Did Betsy retire</p> <p>3 before 2016?</p> <p>4 <b>A. I would say '15 or '16.</b></p> <p>5 Q. Okay. Right around there? Okay. So</p> <p>6 let's say Betsy is still there when these nine</p> <p>7 folks, and we'll go with the lower number that</p> <p>8 you gave me, the nine folks were brokers, and</p> <p>9 that of those nine that you listed, we'll add</p> <p>10 Betsy to make ten, and only you and Betsy were</p> <p>11 the only females, right?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Okay. And so is that how it</p> <p>14 basically always was was you and Betsy?</p> <p>15 <b>A. Uh-huh (positive response), yes.</b></p> <p>16 Q. Did you see that as a problem?</p> <p>17 <b>A. No.</b></p> <p>18 MS. BARLOTTA: Object to form.</p> <p>19 Q. Why not?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. I didn't.</b></p> <p>22 Q. If I changed it up a little and I</p> <p>23 said there were ten brokers and only two of them</p>
<p style="text-align: right;">Page 90</p> <p>1 list and see if you can count the number of what</p> <p>2 you would consider revenue-producing brokers.</p> <p>3 <b>A. I just don't know how other teams</b></p> <p>4 <b>did.</b></p> <p>5 Q. Okay.</p> <p>6 <b>A. Okay. So I know Tyler produced</b></p> <p>7 <b>business. Dave produced business. James</b></p> <p>8 <b>produced business. Lee produced business. Alex,</b></p> <p>9 <b>Trey, Corey, Truitt, Susan. Okay. So what's</b></p> <p>10 <b>that up to, eight or nine?</b></p> <p>11 Q. I've got nine.</p> <p>12 <b>A. I don't know about Corey Woodward. I</b></p> <p>13 <b>don't know about Ross. I don't know about</b></p> <p>14 <b>Jonathan. I don't know what -- if they did or</b></p> <p>15 <b>didn't or what their job responsibilities were on</b></p> <p>16 <b>their team.</b></p> <p>17 Q. Okay. So we've got nine, possibly</p> <p>18 twelve?</p> <p>19 <b>A. I don't know about the other ones.</b></p> <p>20 Q. Okay. When did you say Betsy left?</p> <p>21 <b>A. I didn't.</b></p> <p>22 Q. Okay. Fair enough. When did Betsy</p> <p>23 retire?</p>	<p style="text-align: right;">Page 92</p> <p>1 were black, would that be a problem?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 <b>A. No. I -- not for me, no. If -- I</b></p> <p>4 <b>mean, if we had two blacks, that would be great,</b></p> <p>5 <b>but we don't.</b></p> <p>6 Q. Would that reveal a potential race</p> <p>7 discrimination issue within the department?</p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 <b>A. I don't know. It didn't, and we</b></p> <p>10 <b>didn't talk about this stuff. I don't -- so it</b></p> <p>11 <b>wasn't something we discussed.</b></p> <p>12 Q. Okay. Do you think it's something</p> <p>13 that should be discussed?</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 <b>A. Again, I wasn't there that long to</b></p> <p>16 <b>sit and -- no. We all went to our offices, and</b></p> <p>17 <b>we worked, and we didn't sit around and really</b></p> <p>18 <b>talk about the dynamics of the people in the</b></p> <p>19 <b>department. We all just worked, and everybody, I</b></p> <p>20 <b>thought, was very happy working.</b></p> <p>21 Q. Do you think you could have made the</p> <p>22 same amount of money working anywhere other than</p> <p>23 CRC as a female?</p>

<p style="text-align: right;">Page 93</p> <p>1 <b>A. Nope. No.</b></p> <p>2 Q. Do you think that was a common belief</p> <p>3 of the females at CRC?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. I don't know.</b></p> <p>6 Q. Did you ever hear anybody talking</p> <p>7 about that?</p> <p>8 <b>A. No. I just know I was very blessed</b></p> <p>9 <b>to have my job.</b></p> <p>10 Q. Would you have liked to have seen</p> <p>11 more women promoted?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. It was not -- that was not in my</b></p> <p>14 <b>world of -- I just was there to produce my book</b></p> <p>15 <b>of business, and I did not really -- other than</b></p> <p>16 <b>like trying to help Kathryn, you know, or tell</b></p> <p>17 <b>her to go talk to her -- you know, Corey, I did</b></p> <p>18 <b>not -- office politics or whatever, I was not</b></p> <p>19 <b>involved in it.</b></p> <p>20 Q. Did you think it was strange that you</p> <p>21 talked to Kat in 2016 about her desires to move</p> <p>22 up --</p> <p>23 <b>A. Uh-huh (positive response).</b></p>	<p style="text-align: right;">Page 95</p> <p>1 <b>A. I just had a brain lapse.</b></p> <p>2 MS. BARLOTTA: It's all right.</p> <p>3 Q. Rachel?</p> <p>4 <b>A. Rachel.</b></p> <p>5 THE WITNESS: I'm sorry.</p> <p>6 Q. (BY MS. PALMER:) But Rachel didn't</p> <p>7 show you any other text messages?</p> <p>8 <b>A. Huh-uh (negative response), no.</b></p> <p>9 Q. What was the content of those text</p> <p>10 messages?</p> <p>11 <b>A. Their discussions about how the teams</b></p> <p>12 <b>and the department was operating.</b></p> <p>13 Q. Was there anything in the messages</p> <p>14 that stood out to you?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. Nothing that specifically stood out</b></p> <p>17 <b>other than I was very disappointed.</b></p> <p>18 Q. Why so?</p> <p>19 <b>A. Because of what they were saying to</b></p> <p>20 <b>each other about how they thought teams should be</b></p> <p>21 <b>ran.</b></p> <p>22 Q. Okay. And what do you mean by how</p> <p>23 they thought teams should be run?</p>
<p style="text-align: right;">Page 94</p> <p>1 Q. -- and then by 2019, she's still not</p> <p>2 moved up?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. I don't know when she got promoted or</b></p> <p>5 <b>when she got her -- they did make her a broker,</b></p> <p>6 <b>correct?</b></p> <p>7 Q. We've heard testimony that it was a</p> <p>8 title promotion.</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. Okay. I don't know.</b></p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. I didn't -- I didn't know until I</b></p> <p>13 <b>think all this came up that -- what she was</b></p> <p>14 <b>doing.</b></p> <p>15 Q. Okay. You said when you came in and</p> <p>16 started this deposition that you were shown some</p> <p>17 text messages to prepare for this deposition; is</p> <p>18 that right?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Tell me about those text messages.</p> <p>21 <b>A. They were text messages between</b></p> <p>22 <b>Kathryn and Lauren.</b></p> <p>23 Q. Okay. And who showed you those?</p>	<p style="text-align: right;">Page 96</p> <p>1 <b>A. How they thought the workload should</b></p> <p>2 <b>be different than what it was, and that Dave and</b></p> <p>3 <b>I should retire and get out of there and make</b></p> <p>4 <b>room for young people.</b></p> <p>5 Q. And that's pretty hurtful, isn't it?</p> <p>6 <b>A. Yeah.</b></p> <p>7 Q. Did you see within those text</p> <p>8 messages the back and forth that they had about</p> <p>9 their frustrations about not being able to move</p> <p>10 up within the company?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. I don't remember that as much as just</b></p> <p>13 <b>their workload.</b></p> <p>14 Q. Okay. Do you see how a heavy</p> <p>15 administrative workload would prevent someone</p> <p>16 from moving into a broker role?</p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 <b>A. No, because we all had to do it until</b></p> <p>19 <b>we got our books up to -- up to where we could</b></p> <p>20 <b>afford somebody. You know, we all worked our own</b></p> <p>21 <b>books, including --</b></p> <p>22 Q. How do you work a book if you have</p> <p>23 forty hours a week of administrative work?</p>

<p>Page 97</p> <p>1 <b>A. Well, I don't know. Manage time.</b></p> <p>2 Q. Would it require overtime?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. But, again, brokers aren't overtime</b></p> <p>5 <b>paid, you know. You're paid on your production.</b></p> <p>6 <b>And I handled my own quotes and binders and</b></p> <p>7 <b>policies and everything. Lee handled his own</b></p> <p>8 <b>quotes and binders. Truitt did. We all did.</b></p> <p>9 Q. Do you understand -- I guess in your</p> <p>10 experience, has it -- have you ever said some</p> <p>11 things out of frustration that you didn't</p> <p>12 actually mean?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 <b>A. I can't think of anything off the top</b></p> <p>15 <b>of my head.</b></p> <p>16 Q. You never got a little flustered with</p> <p>17 a situation you were in and said something and</p> <p>18 then later realized maybe it wasn't the nicest</p> <p>19 thing to say?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Not the nicest thing, but I would get</b></p> <p>22 <b>frustrated over accounts or not getting quotes or</b></p> <p>23 <b>things like that. But yeah, I've probably said a</b></p>	<p>Page 99</p> <p>1 Q. (BY MS. PALMER:) Didn't pass first.</p> <p>2 <b>A. They wanted to put these teams</b></p> <p>3 <b>together, about a thousand dollars per team, and</b></p> <p>4 <b>girls were complaining. So they said, Okay,</b></p> <p>5 <b>fine, you can have a team, too. It costs a</b></p> <p>6 <b>thousand dollars. Okay, fine. We're in. We're</b></p> <p>7 <b>ready to go. Then they shut it all down. They</b></p> <p>8 <b>didn't do it.</b></p> <p>9 Q. Because they didn't like to be beat</p> <p>10 by the girls?</p> <p>11 <b>A. Yeah. It was kind of funny. I</b></p> <p>12 <b>forgot all about that.</b></p> <p>13 Q. I never joined any of those fantasy</p> <p>14 leagues. I'm very bad with names, so I don't</p> <p>15 know that I would be very good at it.</p> <p>16 We heard some testimony from Rusty on</p> <p>17 Friday that sometimes there might be beer or wine</p> <p>18 in the office. Does that sound like something</p> <p>19 you may have experienced at all?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. That was back in the old days.</b></p> <p>22 Q. Back in the old days? Was it common</p> <p>23 for the brokers to go out and drink as a group?</p>
<p>Page 98</p> <p>1 <b>lot of things I would like to take back.</b></p> <p>2 Q. And that doesn't make you a bad</p> <p>3 person, right?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. No. That just means I talk too much.</b></p> <p>6 Q. We all do.</p> <p>7 Do you like football?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Do you remember CRC having a fantasy</p> <p>10 football league?</p> <p>11 <b>A. Yeah. Very stressful.</b></p> <p>12 Q. Do you remember the fantasy football</p> <p>13 league splitting off when women began to join</p> <p>14 from the office?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. Oh, that was funny, yeah.</b></p> <p>17 Q. Tell me about that.</p> <p>18 <b>A. It didn't go -- it didn't go -- women</b></p> <p>19 <b>won all the time, and they didn't like it. So</b></p> <p>20 <b>they started their own, but it didn't go past</b></p> <p>21 <b>first base.</b></p> <p>22 THE REPORTER: It didn't go what?</p> <p>23 THE WITNESS: Past first.</p>	<p>Page 100</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. Not common.</b></p> <p>3 Q. Does Wine Down Wednesday mean</p> <p>4 anything to you?</p> <p>5 <b>A. To some of us, yes.</b></p> <p>6 Q. Okay. What is Wine Down Wednesday?</p> <p>7 <b>A. The Tavern has Wednesday half price</b></p> <p>8 <b>wine, and a bunch of the older people, all</b></p> <p>9 <b>retired except Dave and Melissa, would go there</b></p> <p>10 <b>for lunch on Wednesdays. And even as a retired</b></p> <p>11 <b>group, we go there once a month now.</b></p> <p>12 Q. Okay. So you meet up now with who on</p> <p>13 Wine Down Wednesdays once a month?</p> <p>14 <b>A. Whoever. Oh, the names you may not</b></p> <p>15 <b>recognize. Martha Hosey, Leann, Cathy Reeves,</b></p> <p>16 <b>Dave, Ron Helveston comes sometimes. They all</b></p> <p>17 <b>don't show up all the time. Charlie Wood.</b></p> <p>18 <b>There's probably a group of about twelve. Kristi</b></p> <p>19 <b>Sauter, but usually only four or five, six show</b></p> <p>20 <b>up at any one time.</b></p> <p>21 Q. Have you been to any of those Wine</p> <p>22 Down Wednesdays since you retired October 2nd?</p> <p>23 <b>A. No, I have not.</b></p>

<p style="text-align: right;">Page 101</p> <p>1 Q. Well, you should go.</p> <p>2 <b>A. I've been out of town.</b></p> <p>3 Q. Getting all that traveling in.</p> <p>4 <b>A. Uh-huh (positive response).</b></p> <p>5 Q. Did you have a CRC phone?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Did you take that with you when you</p> <p>8 left?</p> <p>9 <b>A. No. It was a company asset.</b></p> <p>10 Q. Did they let you transfer your phone</p> <p>11 number?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Okay. Did anybody ask you to</p> <p>14 preserve anything on your phone related to</p> <p>15 Kathryn Hendrix?</p> <p>16 MS. BARLOTTA: Object to form.</p> <p>17 <b>A. No, but I wouldn't know how to do</b></p> <p>18 <b>that.</b></p> <p>19 Q. Right. Did you turn that phone back</p> <p>20 in when you retired?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. Uh-huh (positive response), yes.</b></p> <p>23 Q. Do you recall if you've got a new</p>	<p style="text-align: right;">Page 103</p> <p>1 Q. Okay.</p> <p>2 MS. PALMER: That is all I have for</p> <p>3 you right now, Ms. Susan.</p> <p>4 THE WITNESS: Get my sign-out paper?</p> <p>5 MS. PALMER: Sign-out paper? Unless</p> <p>6 Rachel has something for you.</p> <p>7 THE WITNESS: Rachel?</p> <p>8 MS. BARLOTTA: I did want to ask you</p> <p>9 one thing.</p> <p>10</p> <p>11 EXAMINATION</p> <p>12 BY MS. BARLOTTA:</p> <p>13 Q. You said -- let me look back at my</p> <p>14 notes. In relation to Ms. Lindberg's hiring, I</p> <p>15 believe your testimony was that Lee, being Mr.</p> <p>16 McClure, needed help, and he built up a book</p> <p>17 enough that he could hire help.</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Did I get that right?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. What did you mean by that?</p> <p>22 <b>A. He had enough revenue that he could</b></p> <p>23 <b>afford to have -- we could have another person on</b></p>
<p style="text-align: right;">Page 102</p> <p>1 phone any time between 2017 and your retirement?</p> <p>2 <b>A. Oh, I'm sure I did, yes.</b></p> <p>3 Q. And when you got a new phone, would</p> <p>4 that go to IT to transfer everything for you?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. However they do that, yes.</b></p> <p>7 Q. So it comes to you out of the box</p> <p>8 ready to go?</p> <p>9 <b>A. Yeah. I don't know how to do those</b></p> <p>10 <b>things.</b></p> <p>11 Q. Were you in any group texts with the</p> <p>12 other brokers, like a just broker group text?</p> <p>13 <b>A. No. I don't -- no.</b></p> <p>14 Q. They didn't invite you to all the</p> <p>15 golf outings?</p> <p>16 <b>A. No. But that's okay, because I don't</b></p> <p>17 <b>golf with them.</b></p> <p>18 Q. With them. Why not?</p> <p>19 <b>A. No. I just -- no, I -- no, I have no</b></p> <p>20 <b>group texts period, other than my brothers and</b></p> <p>21 <b>sisters. And I'm surprised at this thing. Yeah,</b></p> <p>22 <b>I don't remember having that, but I guess we set</b></p> <p>23 <b>it up for that trip.</b></p>	<p style="text-align: right;">Page 104</p> <p>1 <b>our team.</b></p> <p>2 Q. When Truitt Taylor was on your team,</p> <p>3 did he have -- when he was first out of college,</p> <p>4 did he have someone assigned to him, an account</p> <p>5 executive, to handle all of his administrative</p> <p>6 duties?</p> <p>7 <b>A. No.</b></p> <p>8 Q. Who did those?</p> <p>9 <b>A. He did.</b></p> <p>10 MS. BARLOTTA: All right. Thank you.</p> <p>11 MS. PALMER: Anything else?</p> <p>12 Okay. We're done. Just let him read</p> <p>13 us off the record.</p> <p>14 VIDEOGRAPHER: That will conclude our</p> <p>15 deposition at 3:44 p.m.</p> <p>16</p> <p>17</p> <p>18</p> <p>19 FURTHER DEPONENT SAITH NOT</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>

CERTIFICATE

STATE OF ALABAMA )

JEFFERSON COUNTY )

I HEREBY CERTIFY that the above  
and foregoing transcript was taken down by me in  
stenotype, and the questions and answers thereto  
were transcribed by means of computer-aided  
transcription, and that the foregoing represents  
a true and correct transcript of the testimony  
given by said witness.

I FURTHER CERTIFY that I am  
neither of counsel, nor of any relation to the  
parties to the action, nor am I anyway  
interested in the result of said cause.



/s/Tanya D. Cornelius

TANYA D. CORNELIUS, RPR

ACCR #378 Expires 10/1/2024

Notary Expires 9/13/26

Please return the signature page, correction sheet, and transcript within 30 days. The list of corrections will be attached to the original deposition and all parties will be notified of any changes.

Thank you for your prompt attention to this matter.

Sincerely,

Tanya Cornelius  
Certified Court Reporter

WITNESS SIGNATURE PAGE

In Re: Read and sign of Video Deposition of Susan Phillips

I, \_\_\_\_\_, hereby certify that I have read the foregoing transcript of my deposition and it is a true and correct transcript of the testimony given by me at the time and place stated with the corrections, if any, and the reasons therefore noted on a separate sheet of paper and attached hereto.

\_\_\_\_\_  
Video Deposition of Susan Phillips

SWORN TO AND SUBSCRIBED before me this \_\_\_\_\_ day of \_\_\_\_\_, 202\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

MY COMMISSION EXPIRES:

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Cite, LLC



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